

11 August 2024

National Indigenous Australians Agency
PO Box 2191
Canberra ACT 2600



Re: National Strategy for Food Security in Remote First Nations Communities

The Arnhem Land Progress Aboriginal Corporation (ALPA) welcomes the opportunity to respond to the consultation on the National Strategy for Food Security in Remote First Nations Communities. We encourage NIAA to continue to work alongside First Nations organisation like ALPA to improve food security in remote communities.

ALPA was formed in 1972 as a collective of community-controlled stores in East Arnhem Land. Since that time ALPA has been financially independent, owned by Yolŋu members and governed by a Yolŋu Board of Directors. The modest surplus funds generated from store operations benefit the community, providing financial assistance for cultural ceremonies, nutrition programs, education support, medical escorts, and community events.

In 2002 ALPA expanded outside its member stores to operate client stores on behalf of, and in partnership with other Indigenous community organisations. This partnership approach allows these communities to maintain ownership and control of their retail business but with the expertise and support of an experienced Indigenous business partner.

We currently operate in 24 remote communities across a 1.2 million km² footprint. ALPA has over 1200 employees, of which over 80% are First Nations people. In the last financial year, the ALPA group returned over \$46 million to our member communities in the form of wages for First Nations team members, community governed benevolent programs, community sponsorships and capital upgrades

Our mission is to operate successful and responsible businesses, emphasising local employment, training, career pathways, customer service and safety. We strive to improve the health, quality of life, and economic development of our members, giving primacy to cultural heritage, dignity, and desire for opportunity and equality with fellow Australians.

The foundation of ALPA was to ensure reliable access to food and essential goods as a basic human right. ALPA has done this for more than 50 years with little or no government funding. We are acutely aware of the significant role we play to support food security in

the communities we service. Under the leadership of the ALPA Board of Directors, our team strive to improve access to sufficient, safe, and nutritious foods. Improving affordability, whilst maintaining financial viability, continues to be a key focus for our team.

Improving food security will require significant investment and substantial effort across a range of areas, such as the eight Focus Areas outlined in the Discussion Paper. This response will address the Focus Areas of Health, Families and Communities, Stores, Supply Chains, Healthy Economies and Policies, Practice and Governance.

Thank you for considering our response.

For further information please contact:

Laura Baddeley

Nutrition Manager



Response to the consultation on the National Strategy for Food Security in Remote First Nations Communities

Evaluation and Continuous Improvement

The Strategy must be evaluated regularly, at a minimum every three years, with findings to inform the next phase of Strategy implementation. Evaluation must be informed by community and conducted by an experienced independent party.

Specifically in relation to the Focus Area of Stores, ALPA recommends in the Northern Territory, that data collection of the Northern Territory Remote Stores Program is linked to the Northern Territory Market Basket Survey. ALPA recommends this data is used for continuous improvement of the Northern Territory Remote Stores Program, that it supports all retail businesses and stores to achieve Program conditions and that it is flexible to incorporate future opportunities, such as participation in an annual benchmarking approach where non-identifiable Program data are publicly available (as is currently the case for the Market Basket Survey) to promote transparency and the use of data for improvements in food security.

ALPA recommends this approach in the Northern Territory be considered across other jurisdictions in partnership with communities.

Focus area: Health

ALPA agrees with Health as an important Focus Area and we agree with the Proposed Intended Outcomes.

ALPA particularly support the Potential Actions to **work with First Nations Registered Training Organisations to develop a vocational First Nations nutrition workforce pathway linked to ongoing employment and to ensure people living in remote communities have the opportunity to pursue careers in the health and food sectors.**

As noted on page 18 of the discussion paper, primary prevention is likely to be the most cost-effective strategy to reduce diet-related disease and improve the health of First Nations people. Healthy and supportive store environments are an effective primary prevention strategy. ALPA has been leading the way with the creation of evidence-based healthy retailing policy through the co-designed Healthy Stores 2020 randomised controlled trial with Monash University, Menzies School of Health Research, University of Queensland and other partners. These healthy retailing policies are implemented across the stores in the ALPA group (more detail on these policies in Focus Area on Stores).

ALPA has been advocating to the Northern Territory Government as a member of the Coalition for Healthy Remote Stores to strengthen the Northern Territory Remote Stores Program to include restrictions on placement and promotion of unhealthy food and drinks through the four policy asks (see Appendix 1). There would be huge health benefit to all remote First Nations communities with the implementation of the four Coalition asks in all food retail businesses and stores.

See Figure 1. Demonstrating the sugar reduction over time across ALPA owned and ALPA managed stores over the last 6 years. It is important to note, the sugar reduction is greater in stores where the full suite of sugar reduction strategies are in place. The full suite of strategies cannot be implemented in stores with close competition.



Figure 1. Sugar reduction over time – all stores (financial year 2018-2024)

ALPA collaborated with Monash University to investigate the capacity of the remote stores nutrition workforce in Northern Territory and Queensland to support stores to improve population diet. Findings reveal multiple barriers prevent remote nutritionists from working effectively with stores. There is a limited workforce and, in both jurisdictions, priority is given to clinical dietetics. The existing workforce has reported limited knowledge and limited access to training and resources to build capacity in this specialised field of work. The government should increase the remote nutrition workforce, with priority given to public health nutrition positions to achieve greater health gains.

ALPA are ideally positioned to train this workforce to work with stores. Since the 1980s, ALPA have implemented and updated the ALPA Health and Nutrition Policy. The ALPA requirements were above what previous NIAA licensing requirements, and now the Northern Territory Remote Stores Program Standards. Each month our store teams

submit monthly nutrition checklists to ensure all the ALPA nutrition policies, and by default, Government stocking requirements are in place. Through our benevolent fund, we employ three full-time nutritionists to support the implementation of our policy at store level. They also develop and run in-store initiatives and collaborate with health services and research institutions to promote good nutrition and support store licensing compliance.

ALPA as a First Nations Registered Training Organisation is well placed to develop and deliver training to create a First Nations Workforce. ALPA is currently revitalising a non-accredited training program aimed at our Yolŋu team members called the Good Food People training. This training aims to upskill Yolŋu team members to undertake store nutrition related responsibilities such as the fruit and vegetable department, healthy takeaway preparation, health promotion in the store and nutrition policy audits. People completing this training will be equipped to improve the store to be a more health-enabling environment. We note the need for ongoing funding for such training creation and delivery to ensure longevity of a First Nations nutrition workforce.

There has been strong First Nations advocacy since the formation of the Galiwin'ku Nutrition Action Group in early 2024. The Galiwin'ku Nutrition Action Group is comprised of Yolŋu leaders and elders who are passionate about making a difference for their community. The group members are currently being paid for their work through a small grant. The Group has provided feedback on the Northern Territory Remote Stores Program and on the National Strategy for Food Security in Remote First Nations Communities. The Galiwin'ku Nutrition Action Group has the potential to be a long-standing permanent group that acts as an expert group in nutrition and food security to be consulted in related matters for their community if provided long-term stable funding.

Focus Area: Families and Community Infrastructure

ALPA agrees with Families and Community Infrastructure as an important Focus Area and we agree with the Proposed Intended Outcomes.

ALPA support the Potential Action to **introduce a flexible fund to support place-based food security projects** and to **undertake analysis of the emergency and food relief system in remote communities**.

It is critical to acknowledge and recognise the central role the community store have in the planning for and implementation of, suitable, culturally appropriate, relief models in remote First Nations communities. Community members, Store boards and Store owners have the local knowledge, and the facilities and capacity to lead, or advise on, an

appropriate food relief model. The provision of non-community led services, such as Foodbank, can impact negatively on store businesses, and the ongoing viability of the store, and therefore undermines community owned stores and food security of the community following an emergency. A flexible fund could be utilised to strengthen the system that already exists by improving infrastructure and stores holding capacity.

Evidence is clear community gardens are not a solution to improve food security. Community gardens have benefits for the community for educational purposes but do not assist in addressing food pricing and can't meet volumes required to improve food security.

Focus Area: Stores

ALPA agrees with Stores as an important Focus Area. ALPA agrees with all Proposed Intended Outcomes and Actions. We will respond to four Potential Actions.

ALPA agrees with the Potential Action for the development of a **national Industry Code**. A national Industry Code which ideally is, or transitions to, a mandatory code will positively impact the operating environment of stores in remote First Nations community stores across Australia. ALPA supports incentivising retailers for opting into the Code, as evidence suggests voluntary codes do not work.

A national Industry Code will enable the operationalisation of industry- and evidence-informed best practice actions¹, a support package for stores to implement best practice actions in their context, and benchmarking of stores to provide feedback and accelerate this implementation. The code must be co-designed with First Nations owned stores and communities. Developing a monitoring and evaluation system that assesses implementation and effectiveness of the national Industry Code is essential.

The national Industry Code must be applicable to **all food retail outlets**, including takeaways as indicated on page 33 of the Discussion Paper. If takeaways and other businesses selling food and drinks are not included this would result in a **negative consequence** of creating an uneven operating environment. This will limit the effectiveness of the national Industry Code and provide takeaways or other food retail outlets with an unfair business advantage.

Currently what is **missing** in the wording of the Proposed Intended Outcome is the inclusion of takeaways and other food retail outlet (e.g., petrol stations, cafes, bakeries). The wording of this outcome needs to **change**; that is, *Develop national standards for remote stores, takeaways and food retail outlets, including benchmarking and needs*

based support to build capacity, and support implementation in each jurisdiction to improve food security.

ALPA has been crucial in previous work that could inform the national Industry Code. The co-designed continuous improvement benchmarking approach developed with remote stores and Aboriginal health services which incorporates the Healthy Stores 2020 Policy Action series of industry- and evidence-informed best-practice co-designed actions¹.

In December 2019 the ALPA Board of Directors passed 29 new nutrition policies that were informed by current nutrition research and our sales data which highlighted opportunities to curb unhealthy food consumption. Our new policies also focused on supporting customers to make healthy food and drink purchases and limit unhealthy purchases through modifications to the store environment, and the way products are promoted. We tested some of these bold nutrition policies through Healthy Stores 2020, a randomised controlled trial co-designed by ALPA, Monash University, Menzies School of Health Research and others in response to community leaders' requests to curb sugar consumption. This groundbreaking study was implemented over a 12-week period, across 20 ALPA stores – 10 stores receiving the strategies, and 10 stores acting as a control. It resulted in a 2.8% (statistically significant) reduction in total free sugars sold, which is equivalent to 1.8 tonnes less free sugars being purchased.² A massive achievement - over 12 months that equates to 7.2 tonnes less sugar going into 10 communities. The biggest reductions came from strategies targeting confectionery (9.5% less sugar from confectionery) and soft drinks (12.5% less sugar from targeted soft drinks). **There were no adverse impacts on business outcomes as purchases transferred to healthy foods or non-food lines. Customer acceptability was high as it was driven by each participating store board.**

Since the trial, we have successfully rolled out the Healthy Stores 2020 policies to all ALPA operated stores. The unfortunate exception to this is one strategy – the relocation of large volume (1.25L) soft drinks. This is unable to be implemented in communities where we have a competitor store. All stores within the community must implement this strategy to ensure it has impact and does not financially disadvantage the store wanting to support community health. An example of this is Galiwinku. We own two stores in Galiwinku, and due to the presence of two privately owned stores, one privately owned takeaway, and one service station we cannot relocate 1.25L soft drinks, a great disappointment to our Galiwinku board representatives and other community leaders. They have seen how successful the strategy is in the other ALPA member stores and want to achieve the same results for their community.

Related to regulatory environments, ALPA as a member of the Coalition for Healthy Remote Stores has advocated to the Northern Territory Government for four key policy

asks to be mandated in the Northern Territory Remote Stores Program Standards (see Appendix 1). These policy asks are derived from the now internationally recognised evidence and incorporated in the Healthy Stores 2020 Policy Action Series.¹

Two of these key policy asks have been incorporated in the draft Northern Territory Remote Stores Program as Standards:

- no placement of sugary soft drinks of more than 600ml in refrigerators,
- less than 50% of refrigerator facings made up of sugar sweetened beverages.

Two of the key policy asks have been incorporated as Guidelines in the draft Northern Territory Remote Stores program:

- no promotional activity on unhealthy food and beverages, including no price promotions or discounts, no volume promotions (e.g., 2-for-1 deals), and no other display material (e.g., posters, shelf stripping),
- no availability of unhealthy food and beverages in high traffic areas, including store entrance, checkout area and counter, and front-, between- and end-of-aisle displays (except where infrastructure/situations prevent this).

Strong community support has been demonstrated for the Coalition asks in the Northern Territory by a significant number of Aboriginal Store Boards and Aboriginal-led groups including: Ajurumu Store Board, the ALPA Galiwin'ku Community Advisory Committee, Kalkaringi Store Board, Lajamanu Store Board, Mikbamurra Store Board, Mutitjulu Community Aboriginal Corporation (owners of the Ininti Store), Pirlangimpi Store Board, Warliburru Store Board and the Galiwin'ku Nutrition Action Group.

As stated earlier, the four key asks from the Coalition have already been implemented across the ALPA group following the Healthy Stores 2020 study in both Northern Territory and Queensland stores. However, removal of sugar soft drinks over 600mL cannot be implemented in stores with close by competition. If our stores, with close food retail competition removed larger volume (more than 600mL) sugar soft drinks from the fridge it could have had an adverse effect on the financial position of the store. Customers might go to the other store/café/takeaway to a large volume refrigerated sugar soft drink and end up doing their whole shop there. This would reduce the viability of the store doing the healthy retailing. Developing a national Industry Code would ensure that all communities would benefit from the implementation of best practice actions for healthy remote stores. The code would need to be reviewed and updated regularly, at least every three years, to ensure it continues to align with up to date evidence.

ALPA agrees with the Potential Action to **support healthy in-store environments, promote healthy food options and increase availability and affordability of healthy foods**. Community stores have the capacity to significantly influence purchasing

patterns through modifying the in-store environment. The Healthy Stores 2020 Policy Action series¹ provides best-practice actions to aim for, for healthy stores in remote communities. What is **missing** in the wording of this Potential Action, is the need to disincentive unhealthy food options, in addition to promoting healthy options; that is, *invest in the capability of community stores to support healthy in-store environments, promote healthy food options **and disincentivise unhealthy food options**, and increased availability and affordability of healthy foods.*

Subsidies are one measure to improve **healthy food affordability**. The Queensland Government has recently announced an increase in the discount it applies on essential goods from 5.2% to 20% in all remote communities in Queensland. The magnitude of this 20% subsidy is in line with international recommendations and evidence for modifying purchasing behaviour including evidence generated in the Australian remote store context³ and will therefore impact on food security and health equity. This action provides a precedent for other jurisdictions.⁴

The ALPA Board of Directors understand the link between diet and disease and prioritise health in their Health and Nutrition Strategy and Policy. ALPA strives to provide affordable healthy options to customers and self-fund a freight subsidy in the member stores on a range of healthy fresh, frozen, chiller and grocery items. ALPA have implemented a freight subsidy on fresh fruit and vegetables to support consumption. In the 2024 financial year, ALPA member stores freight subsidy equated to approximately \$750,000. Within ALPA member stores, healthy food subsidies have been in place since the 1980s. The freight subsidy is completely independent of government funding.

All essential service providers in remote communities – emergency services, schools, councils, and the store – experience higher operational costs compared to urban settings. Everything we do costs more: employment, insurance, governance, power, rent, repairs and maintenance, yet our stores do not receive support to cover these expenses like other essential community services.

ALPA agrees with the Potential Action of, with **community engagement and input, integrating food security in crisis preparedness, response and recovery**. Food insecurity caused by communities becoming isolated due to severe weather events or unexpected extended wet seasons is a significant issue and occurs regularly. Remote stores have operational plans to manage routine weather events, such as annual road closures due to wet season rains. There is no national approach to provide the urgent support required to enable remote community stores to maintain minimum stock levels in these events. Our stores pay significant additional freight costs to ensure re-supply during these periods. If stores are not able to cover these freight costs, there is a **risk** that the community will run low on food and other essential supplies. A responsive funding

model to support remote community store supply of essential food and goods during crisis periods is needed. The model should incorporate the following elements:

- Community stores must play a central role in continuing to supply essential food and grocery items to their community during periods of isolation.
- Alternative freight methods must be utilised (e.g. air freight, alternative routes) to ensure supply of essential food and grocery items to the store.
- The additional costs incurred by alternative freight methods must be funded by government. It is unviable for many community stores to cover this unplanned cost.
- Funding needs to be accessible to stores at the time of need to ensure adequate supply of essential food and grocery items are maintained.

Emergency relief models that exist in non-remote areas, such as Foodbank, are less relevant in remote Aboriginal and Torres Strait Islander communities and have the potential to undermine the viability and the central role of community stores. These relief models should only provide support where a community store is unable to, and with agreement of the community.

ALPA agrees with the Potential Action to **provide access to support for financially unsustainable stores identified as an essential source of food and groceries**, and that this allows for community-led decision-making and store management.

Focus Area: Supply Chains

ALPA agrees with Supply Chains as an important Focus Area. We recognise the Potential Intended Outcomes will assist in creating health-enabling stores, by increasing the quality and availability of healthy foods and improving healthy food affordability.

ALPA agrees with the Potential Actions of **investment plans to upgrade road, air, and sea transport infrastructure** as well as including **consideration of food storage and distribution centres closer to remote communities** and to **increase access to bulk pricing assisting remote community stores to collaborate and develop partnerships with wholesalers**.

ALPA supports all efforts to improve roads, barge landings and other transport infrastructure. ALPA can provide details on the greatest areas of concern in our logistics network as required.

Funding needs to be available to increase our stock holding capacity in stores. Particularly important is increasing capacity of freezers, chillers and dry goods storage areas for stores that are impacted during the wet season.

ALPA support Logistics Hubs in larger communities, where the store does not have space for more storage infrastructure. The operation of Logistics Hub could mirror what is commencing in Ramingining and being built at Galiwin'ku. A Logistics Hub could also hold stock for other essential service providers such as Health Clinics, Aged care, Police and School.

The NIAA led National Food Security Working Group has the potential to combine buying power to achieve improved freight and base cost prices that could be passed on to consumers. In lieu of this, we will continue to utilise our current methods (freight subsidies, reduced mark ups, collective buying power) to address price inequity in remote communities and ensure supply and sustainability of remote stores.

This solution can't just be ALPA dropping our prices, the wholesalers need to drop their prices. We need to survive, we all need to play this game together. The Government needs to work with stores and wholesalers to get lower prices if this will work in the longer term.

- Mr Wunungmurra, Former Chairman, ALPA

Remote retailers are constantly compared to the big supermarkets yet we do not have the buying power to negotiate in the same way. ALPA supports the NIAA to work with **food and drink manufacturers to lower prices** to Independent wholesales and therefore remote retailers. This simple action will lower prices for First Nations people living in remote communities.

ALPA agrees with the Potential Action of **emergency and disaster risk management policies including supply chain management and food security measures**. Our position on crisis preparedness, response and relief in the Focus Area of Stores is relevant, and is re-stated here.

ALPA agrees with the Potential Action of, with **community engagement and input, integrating food security in crisis preparedness, response and recovery**. We are acutely aware of the food security risk occurring when communities are isolated due to severe weather events or unexpected extended wet seasons. ALPA has strong operational plans to manage routine weather events, such as annual road closures due to wet season rains. We work alongside suppliers and transport companies to ensure our stores are adequately prepared.

When transport infrastructure is not adequately maintained in between routine weather events, stores are further impacted. Lajamanu is historically not a wet season store. However, in 2023 the Lajamanu Store was cut off for 16 weeks. In the 2024 wet season the store was cut for 12 weeks. The Store has the capacity to carry 6 weeks' worth of

grocery stock. Fresh produce continued to be flown in during the period where roads were impassable. Flying in stock is incredibly expensive. Compounding factors of severe weather events and inadequately maintained dirt roads contributed to the store being unreachable by road.

There is no national approach to provide the urgent support required to enable remote community stores to maintain minimum stock levels in these events. This results in community stores having to pay significant additional freight costs to ensure re-supply. If stores are not able to cover these freight costs, there is a **risk** that the community will run low on food and other essential supplies. A flexible and responsive funding model to support remote community store supply of essential food and goods is needed.

As stated above, the model should incorporate the following elements:

- Community stores must play a central role in continuing to supply essential food and grocery items to their community during periods of isolation.
- Alternative freight methods must be utilised (e.g. air freight, alternative routes) to ensure supply of essential food and grocery items to the store.
- The additional costs incurred by alternative freight methods must be funded by government. It is unviable for many community stores to cover this unplanned cost.
- Funding needs to be accessible to stores at the time of need to ensure adequate supply of essential food and grocery items are maintained.

Emergency relief models that exist in non-remote areas, such as Foodbank, are less relevant in remote Aboriginal and Torres Strait Islander communities and have the potential to undermine the viability and the central role of community stores. These relief models should only provide support where a community store is unable to, and with agreement community.

Focus Area: Healthy Economies

ALPA agrees with Healthy Economies as an important Focus Area. We recognise increased employment, training, and social security income such as through the Remote Area Allowance as a crucial to improving healthy food affordability and food security.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

A taxation model must be aimed to encourage manufacturers to innovate and reformulate to reduce sugar levels in drinks and be accompanied by adequate resources for implementation and monitoring to measure impact. ALPA is concerned that a sugar tax could have unintended consequences for pricing in remote communities. A sugar tax cannot further increase prices for remote First Nations communities.

ALPA supports **flexible remote training and employment program that delivers improved remote food security and nutrition outcomes.**

ALPA as a First Nations Registered Training Organisation is well placed to develop and deliver training to create a First Nations Nutrition Workforce. We note the need for ongoing funding for training creation, training delivery and long-term job stability to ensure longevity of First Nations employment in food security related work.

Focus Area: Policies, Practice and Governance

ALPA agrees with Policies, Practices and Governance as an important Focus Area.

Specifically in relation to further supporting and creating health-enabling stores, significant resources are required to support First Nations decision-making or **governance** of their stores based on evidence, and a local, trained and supported **workforce** to drive the ongoing implementation of best practice actions in remote community stores.

ALPA board and governance practices are widely perceived as the model for Indigenous organisations. A highly principled and strongly governed ALPA Board of Directors and management team take pride in ensuring the highest governance standards are met in all matters relating to the Board and their responsibility to the organisation. Our ALPA board meetings are timed with the end of each financial quarter and run for two days.

Conclusion

Significant investment and coordinated effort are required in all Focus Areas of the Discussion Paper to improve food security in remote communities.

We call for intersectoral support to improve food security across remote First Nations communities nationwide. We call for ongoing government-run freight subsidies especially to locations most disadvantaged such as barge-dependent locations and wet-season affected stores. We welcome price monitoring and a national industry Code. Grant funding for improving store infrastructure and maintenance needs to be flexible and simple to access. Additionally, there should be increasing investment in training to build a First Nations nutrition and food security workforce as well as the increasing the numbers and capacity of the remote public health nutrition workforce.

We sincerely hope this strategy is translated into meaningful and sustained action that improves food security, health and quality of life for remote First Nations Australians.

References:

1. [Ferguson M, Brimblecombe J. RE-FRESH CRE, 2021](#)
2. [Brimblecombe J, et al, The Lancet Planetary Health. 2020](#)
3. [Brimblecombe J, et al. Lancet Public Health. 2017](#)
4. [Ferguson M, et al, Croaky Health Media, 2024](#)
5. [Northern Territory Government. NT Market Basket Survey 2023](#)
6. [Yang Q, et al, JAMA Intern Med. 2014](#)
7. [Miles Doing What Matters: Cheaper groceries, essentials for Cape York, Torres Strait and Gulf. 2024.](#)

Appendix 1: The Coalition for Healthy Remote Stores Policy Statement



Joint Policy Statement of The Coalition for Healthy Remote Stores on the Northern Territory Remote Stores Program

We commend the Northern Territory Government for developing the legislative structure within the NT Remote Stores Program (Program) via the Food Act 2004 (NT), following the cessation of the Remote Stores Licensing Program with the sunseting of The Stronger Futures in the NT Act 2012 on 16 July 2022.

We commend the Northern Territory Government for working to strengthen the Program, (which remains largely unchanged from its inception in 2007), in line with community priorities, evidence, remote retail industry standards, and national and international best practice to improve food security and create healthy stores and communities.

Key policy positions

1. We recommend that additional requirements of stores (food businesses including takeaways and roadhouses) be added to the Program to restrict promotion and placement of unhealthy food and beverages. These are:
 - a. no promotional activity on unhealthy food and beverages, including no price promotions or discounts, no volume promotions (e.g., 2-for-1 deals), and no other display material (e.g., posters, shelf stripping),
 - b. no availability of unhealthy food and beverages* in high traffic areas, including store entrance, checkout area and counter, and front-, between- and end-of-aisle displays (except where infrastructure/situations prevent this),
 - c. no placement of sugary soft drinks of more than 600ml in refrigerators,
 - d. less than 40% of refrigerator facings made up of sugar sweetened beverages,
2. We also recommend:
 - a. supply a minimum of 10 fruit and 15 vegetable varieties, and

- b. store pricing policy that promotes healthy food and beverages and disincentivises unhealthy food and beverages* through measures such as cross-subsidisation, a policy already implemented in many stores.
- 3. We recommend that the Program develop a monitoring and evaluation system that:
 - a. streamlines data collection including the use of tools such as the Market Basket Survey,
 - b. ensures continuous improvement in the Program and its operation,
 - c. routinely reports on the outcomes of the Program in achieving its aims,
 - d. establishes compliance, with mechanisms that support stores to achieve Program conditions, and
 - e. is flexible to incorporate future opportunities, such as participation in an annual benchmarking approach with a dashboard where non-identifiable Program data are publicly available to increase transparency and promote use of available data.

*Unhealthy (also known as discretionary) food and beverages are high in sugar, fat, and salt¹. These include sugary drinks (soft drinks, cordial, and fruit drink), confectionery, sugar, sweet biscuits, cake, ice cream, processed meat, pies and sausage rolls, crisps, deep fried foods (e.g., chips), salt².

Who we are

The Coalition for Remote Healthy Stores is comprised of 14 Aboriginal-led, Aboriginal-community controlled and non-government, retail, health organisations, research institutes and universities. We recognise the critical role that food retail stores have in preventing and managing preventable chronic disease. We call for evidence-informed action to support storeowner and retailer efforts to improve the healthiness of food retail stores in remote Aboriginal and Torres Strait Islander communities across Australia. Immediate action is needed to reduce the health inequity experienced and improve health outcomes to support the strong future of communities.

Facts and evidence

1. Legislation is increasingly used to shape healthy food retail environments, such as the [UK Governments Food \(Promotion and Placement\) \(England\) Regulations 2021](#) to restrict unhealthy food promotions in retail stores.¹
2. Evidence generated with remote stores shows that for the promotion of healthy food to have a health cost-benefit, strategies that restrict the promotion and placement of unhealthy food and beverages are needed.²
3. In 2018, evidence from the co-designed Healthy Stores 2020 study, showed that restricting price promotion (3a above), removing unhealthy food and beverages from high traffic areas (3b) and only displaying sugary soft drink >600ml on shelves rather than in refrigerators (3c), resulted in significant reductions in sugar purchased (i.e., a 2.8% reduction in free sugars; or 1.8 tonnes less sugar from 10 stores in 12 weeks), while not impacting store profit.³ This strategy is now embedded in ALPA's organisational policy, though only partially adopted (3a, 3b) for stores where there is another store/s in close proximity. Modelled data suggest that the reduction in free sugars achieved with the Healthy Stores 2020 strategy could result in a 10% risk reduction in mortality from cardiovascular disease.^{3,4} Chronic disease is responsible for over half of the burden of disease experienced by Aboriginal and Torres Strait Islander people.⁵ In Central Australia

40% of Aboriginal adults living in remote communities have type 2 diabetes.⁶ Diet has been identified as a leading risk factor contributing to chronic disease⁵

4. In 2019, the Healthy Stores 2020 Policy Action series was co-designed by 30 storeowners, retailers, government and non-government personnel and academics from the NT and North Queensland. The series outlines best practice actions to aim for, for healthy stores in remote communities.⁷
5. The NT Market Basket Survey reports that a healthy diet costs 52% more in remote communities than supermarkets, with the gap increasing since 2008.⁸ To address healthy food affordability, many stores negotiate deals with suppliers or cross subsidise healthy food and beverages e.g., fruit and vegetables and bottled water, by increasing the price on discretionary food and beverages e.g., confectionery and soft drink.⁹
6. The Store Scout App is designed to assess best practice actions in remote stores and provide feedback to stores on areas of practice that could be strengthened.¹⁰ The use of this tool could be considered in the monitoring and evaluation of the Program.
7. Storeowners, retailers, and those who work to support their efforts are leaders in creating policy and developing evidence to create healthy food retail environments in remote communities.¹⁰⁻¹³

Responsibility and current contacts

The Coalition is represented by organisations who work in partnership with Aboriginal leaders and community residents to improve food security and healthy stores. Megan Ferguson is the primary contact.

- Arnhem Land Progress Aboriginal Corporation: Laura Baddelley
- Monash University: A/Prof Julie Brimblecombe
- Menzies School of Health Research: Prof Louise Maple-Brown
- The University of Queensland: Dr Megan Ferguson

References

1. [UK Government. Consultation outcome. Restricting promotions of products high in fat, sugar or salt London, England: UK Government; 2022.](#) 2. [Brimblecombe J, et al. Lancet Public Health. 2017.](#) 3. [Brimblecombe J, et al. Lancet Planet. Health. 2020.](#) 4. [Yang Q, et al. JAMA Intern Med. 2014.](#) 5. [Australian Institute of Health and Welfare. Australian Burden of Disease Study 2018: key findings for Aboriginal and Torres Strait Islander people. Canberra: AIHW; 2021.](#) 6. [Hare M, et al. BMJ. 2022.](#) 7. [Ferguson M, Brimblecombe J. RE-FRESH CRE, editor. Melbourne 2021. \[cited 2021\].](#) 8. [Northern Territory Government. Northern Territory Market Basket Survey 2021. Summary Report. Darwin, Australia: NT Health; 2022.](#) 9. [Ferguson M, et al. IJERPH. 2018](#) 10. [Jaenke R, et al. Public Health Nutr. 2021..](#) 11. [The Arnhem Land Progress Aboriginal Corporation. Health and Nutrition Strategy Darwin: ALPA.](#) 12. [Outback Stores. Healthy Food Strategy Darwin: Outback Stores; 2022.](#) 13. [Mai Wiru. 2016.](#)

Version: 19 July 2024