



11 August 2024

National Indigenous Australians Agency

PO Box 2191

Canberra ACT 2600

Via: RemoteFSConsultations@niaa.gov.au

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

Katherine West Health Board (KWHB) 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 seek input and collaboration with organisations like KWHB to improve food security in remote communities.

KWHB is a provider of preventative, clinical and emergency primary health care in the Northern Territory. Founded in 1998, KWHB is a fully accredited community-controlled health service for 26 years which is operated by a board of directors. The KWHB region spans across river and desert country of the remote south west region of Katherine.

KWHB recognises the critical role that food retail stores, housing/infrastructure, education and health service delivery all contribute to preventing and managing chronic disease.

KWHB call for evidence informed action to support health centres and store operators to ensure consistent outcomes of health messages that KWHB convey. Successes will be achievable through the efforts of improving overall healthiness of remote stores in remote Aboriginal and Torres Strait Islander communities across the whole of Australia.

Immediate action is needed to reduce the health inequality experienced by those living in remote settings and to improve health outcomes that support the strong future of all remote communities.

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Katherine West Health Board (KWHB) Response to the consultation on the National Strategy for Food Security in Remote First Nations Communities

Evaluation and Continuous Improvement

The strategy will require continuous evaluation over specific intervals in a set time frame for consistent evaluation and continuous improvement. Findings from the evaluation will need to inform the next stage of strategy implementation to ensure improvement and recognise gaps. Recommendation is that evaluation design to be informed by communities and conducted by an experienced independent party.

In relation to remote stores, KWHB recommend that the data collection of the NT Remote Stores Program is linked to the NT Market Basket Survey and that the data is used for continuous improvement of the NT Remote Stores Program. The program needs to support stores to achieve the program conditions and that it is flexible to incorporate future opportunities, such as participating in the annual benchmarking approach where non-identifiable data is publicly available to promote transparency and the use of data for improvement in food security.

Focus area: Health

KWHB maintains that health is an important focus area of the strategy, and we agree with the intended outcomes of the program.

KWHB particularly agree with the action area *“to work with First Nations Registered Training Organisations to develop a vocational First Nations nutrition workforce pathway linked to ongoing employment”*. KWHB prioritises and is continuously working towards strategies to increase Aboriginal work force in our remote health clinics. 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 health outcomes. Local workforce in the primary health care setting will allow us to be informed in providing culturally safe health care programs and increasing engagement across KWHB’s many focus areas on which we deliver health education.

KWHB have experienced the same capacity issues of the remote stores nutrition workforce in NT to support clients to improve population diet. Multiple barriers prevent remote nutritionists from working effectively with stores and clients such as limited workforce and, prioritisation of clinical dietetics. Existing workforce has limited knowledge and 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 positions to achieve greater health gains. Ensuring priority is placed on building core resources in this space which will assist staff engaging with clients.

KWHB are positioned to train Aboriginal Health Practitioners however there should be major components of nutrition, food security provided in the core training by recognised institutions. Organisations like KWHB can then foster this knowledge with extra assistance such as health coaching programs to continue to grow knowledge base and boost local employment. Priority education should be given to identified positions to increase training in the food and nutrition space and increase the sharing of knowledge happening between public health nutritionist's and local staff. Travelling program staff are often limited to visits on a schedule e.g. service 8 communities and travel once per fortnight, serviceability to be regular is approx. one visit every 6-8 weeks per location.

Focus Area: Families and Community Infrastructure

KWHB agrees with the Families and Community Infrastructure as an important focus area, and we agree with the proposed outcomes.

KWHB 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 the role an Aboriginal Medical Service has in the planning and implementation of culturally appropriate relief models in remote first nations communities. Community members and board members of the medical service have the local knowledge, facilities and capacity to lead, or advise on appropriate food relief models. The provision of non-community led services such as Foodbank, can impact negatively on store business viability therefore undermines community owned stores and food security of the community following an emergency. Evidence has shown that food donations can often negatively impact the health outcomes of populations as they are not contributing to building sustainable community development principals in which medical services like KWHB rely on.

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 consistently meet volumes required to improve food security.

Current infrastructure in KWHB remote communities directly impacts the health of the population and it has significant deficits. The funding models for upgrades and essential maintenance has many constraints due to KWHB health centres and housing being leased from the Department of Health or Northern Territory Housing.

Service maintenance funding is restricted to KWHB owned properties and cannot be utilised for government assets. These are purpose-built facilities in which funded upgrades would positively impact the health of the client base regardless of ownership; this is a constant constraint in recruitment of remote health staffing as ensuring security of housing is not always a priority (or funding resources unavailable) for non-owned KWHB assets.

Store operations are also affected by the same infrastructure issues and the recommendation in the NT remote stores program standards are directly reliant on the infrastructure available. The national draft strategy clearly outlines the importance of community housing and infrastructure however this needs further expansion on stakeholder infrastructure and how this can also directly affect food security when it comes to operating a remote store or clinic. Remote stores do not have access to funding like other stakeholders do and the increased expenditure of operating a business in a remote community falls back on consumers to cover the costs in the goods purchased.

Focus Area: Stores

KWHB agrees that stores are a vital focus area and KWHB agree with all proposed intended outcomes and actions.

KWHB 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. KWHB 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 are not included this would result in a negative consequence of creating an uneven operating environment for takeaways. This will limit the effectiveness of the national Industry Code and provide takeaways or other food retail outlets with an unfair business advantage. Viability needs to be considered for all remote operations, large and small.

¹ [Ferguson M, Brimblecombe J. RE-FRESH CRE, 2021](#)

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.*

Recommendations for the draft NT Remote Stores Program Standards; Schedule A suggest;

- Minimum requirements for varieties of fruit and vegetables be at 10 fruit and 15 vegetables. From Market Basket Survey results there are some stores that are stocking above this and some below.

With consistent surveying the recommendation is that the requirements be adjusted upwards once baseline is achieved. This will ensure stores are encouraged to continue to do better in improving access for people living in remote areas of the Northern Territory.

- Specification for iron and fortified bread to be stocked. As bread is highly consumed in remote communities, not specifying fortification is a missed opportunity to improve health.
- Baby formula suitable from 0-6 months and 6-12 months requires clarification. At present, this can be interpreted as stocking either option rather than both as essential items. Step 1 is the only safe formula (0-6m) for bottle fed infants under 6 months old, therefore essential. Step 2 (6-12m) is not safe for babies under 6 months old, however is more appropriate than step 1 for infants over 6 months old.

It is recommended these are split into two product lines for clarity and consumers have access to both varieties as essential items.

- Baby food and items: recommendations are to keep a red meat and vegetable option for 4m+, 6m+ and 8m+. as they are different textures the current schedule does not include a 6m+ option.

Bottle brushes are not included as essential however are important for maintaining proper bottle hygiene. Hygiene, preparation of formula and bottles, introduction of solids are all education topics KWHB offers to clients, so these items are all essential to ensure that educational outcomes are achievable.

- More detail is required for takeaway requirements, the current list or definition of what is considered healthy food for takeaway requires further expansion.

A suggestion to address this gap is to include that stores that have takeaways offer:

- at least 2 healthy hot meal dishes and not more than 2 hot meal unhealthy dishes,
- at least 4 healthy snacks and not more than 4 unhealthy snacks, and
- a salad, 2 types of sandwiches and not more than 3 unhealthy cold options.

The previous NIAA NT Stores Licensing Program inclusion in the program was “stores to be a significant source of food, drink OR grocery items”. Changing OR to AND modifies the program.

This is especially the case as the NT Remote Stores Program Standards place requirements on takeaway meals for stores that offer these, but these standards will not apply to standalone takeaways. This provides an uneven playing field for standalone takeaways. It will limit the effectiveness of the Standards and provide takeaways with an unfair advantage.

The National Strategy for Food Security in Remote First Nations Communities (National Strategy) indicates that takeaways should be included in any food security strategy.

It is noted that the NT Remote Stores Program discussion paper indicates that once the National Strategy is finalised, the Northern Territory Government will determine if changes to the NT Remote Stores Program are required to align with the National Strategy.

The draft discussion paper for the National Strategy highlights the importance of ensuring that “takeaway outlets are included in food security strategies to ensure better nutrition outcomes for communities.”²

This is an opportunity to align with the direction of the National Strategy from the outset.

There are potential solutions to ensure that takeaways are included in the NT Remote Stores Program such as:

- Modify the definition of what constitutes a community store to be ‘a significant source of food, drink OR groceries.
- Have an additional classification of store called Specialisation for where primarily ready to eat meals and drinks are stocked.

The criteria should include the nature and type of business as per NIAA classification. An average weekly turnover (over a 3-month period) could be used to classify a store. It is common for store turnover to fluctuate week to week depending on factors including season, community events (sorry business, ceremonies) and royalty payments.

All community stores should participate in the bi-annual Market Basket Survey. The recommendation is that this data be used to design measures to increase healthy food affordability to be implemented by the Northern Territory Government and the Australian Government, such as through the consultation on the National Strategy for Food Security in Remote First Nations Communities.

Recommendation of the requirement of each store to provide a written plan with support for how it will promote good nutrition to its customers. We strongly believe that this should also include a plan for disincentivising unhealthy foods and drinks to customers, and the two

² National Indigenous Australians Agency. National Strategy for Food Security in Remote First Nations Communities - Discussion Paper; 2024.

community-supported, evidence informed key policy asks which we understand will be included as Guidelines would support this:

- 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)

KWHB 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 series³ 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*.

Recommendation that the Healthy Stores 2020 Policy Series also be made available to support stores in developing a written plan.⁴ The Good Tucker App is also a resource that can be utilized by store staff and customers.

Evidence from the 2018 co-designed Healthy Stores 2020 study demonstrated that implementing these four asks in store 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.⁵ Modelled data suggests 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.⁶ Implementation of these four asks will contribute to supporting the Close the Gap outcomes. There is significant community support for these key policy asks across the Northern Territory and nationally.

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

³ [Ferguson M, Brimblecombe J. RE-FRESH CRE, 2021](#)

⁴ [Ferguson M, Brimblecombe J. RE-FRESH CRE, 2021](#)

⁵ [Brimblecombe J, et al. Lancet Public Health. 2017](#)

⁶ [Brimblecombe J, et al, The Lancet Planetary Health. 2020](#)

evidence generated in the Australian remote store context ⁷ and will therefore impact on food security and health equity. This action provides a precedent for other jurisdictions. ⁸

KWHB 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. 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 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.

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

Focus Area: Supply Chain

We are acutely aware of the of the food security risk occurring when communities are isolated due to sever weather events. 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

⁷ [Brimblecombe J, et al. Lancet Public Health. 2017](#)

⁸ [Ferguson M, et al, Croaky Health Media, 2024](#)

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. Yarralin also experienced the same issues and was cut off for upwards of 20 weeks in 2024 and the store infrastructure can only support one week worth of food. Planes that can land could carry 3-4 days of food and flights were irregular due to weather.

Focus Area: Healthy Economies

KWHB 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.

KWHB tentatively agree with the Potential Action of establishing a *“National Sugar Tax and utilising the revenue to provide community level food security”*.

KWHB emphasises the unique environments within which we operate and strongly advises revenue raised to be redistributed to the most food insecure remote communities.

The Northern Territory Market Basket Survey 2023 reports that the average cost of a healthy food basket in remote stores in the Northern Territory was 40% higher than in the average district centre supermarkets⁹. Taxing the consumer when they are already experiencing the increased cost of living along with the constraints on finances living in a remote location, a tax on consumers is questioned. If the money is to be distributed to areas such as emergency food relief for stores operations, then it could have benefits to food security however this will require appropriate modelling.

KWHB propose that consideration be given to:

1. Funding for community maintenance programs including store building repairs and/or installation and maintenance of chillers, freezers and generators to ensure there is adequate space for perishable fresh foods and frozen goods.
2. Direct store grants to supplement stores in need of financial support. For example, establishment of a fund to support store infrastructure required to supply healthy foods and beverages.
3. Funding a freight subsidy for locations most disadvantaged such as barge-dependent locations and wet-season affected stores.
4. An increase in the discount on GST-free foods (which are mostly healthy foods) for remote areas of Australia.

⁹ [Northern Territory Government. NT Market Basket Survey 2023](#)

5. Freight subsidies in remote communities for GST-free foods, like that announced by the Queensland Government.⁷

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. KWHB 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.

Summary:

KWHB recognises that significant and coordinated effort is required in all focus areas of the discussion paper to improve food security in remote communities.

Ensuring financial support is available for stores that are isolated unexpectedly or for an extended duration during the wet season or related to other weather events, which will enable them to meet food security requirements. This funding should cover any additional freight costs, particularly for fresh produce that cannot be stored for long. It is also important that stores have resilience to road disruptions for example through adequate storage infrastructure. Support should be provided throughout any period of unexpected or extended disruption, not just when an emergency is declared.

The KWHB Board of Directors understand the link between diet and disease and prioritise health in the KWHB Nutrition Policy and Guidelines and across our strategic operational plan. All service providers in remote communities; clinic, 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 there are still provisions on some funding models like Service Maintenance which make up a large part of our opportunity to obtain funding to improve infrastructure.

We hope this strategy will create action in all areas of government to be working collaboratively with community-controlled organisations to achieve improved health and quality of life for First Nations people.

References

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