

Overall Feedback

Consultation Question: What does food security mean to you?

Health and Wellbeing Queensland (HWQld) agrees with the United Nations (UN) definition of food security '*physical, social, and economic access to sufficient, safe, and nutritious food that meets their dietary needs and food preferences for an active and healthy life*' and acknowledges the alignment between target outcomes outlined in the Discussion Paper, the UN pillars of food security and [Gather + Grow 2023-2032](#). HWQld also welcome and support the inclusion of the Aboriginal and Torres Strait Islander-informed definition of food security. We emphasise the importance of addressing food security through community consultations to capture the voices and experiences of community members to ensure that the perspectives of those directly affected by food insecurity are heard and integrated into any strategic approach.

HWQld acknowledges that food security is a complex and multifaceted issue that can be difficult to define universally. The experience of the food system and food insecurity is different across Australian remote Aboriginal and Torres Strait Islander communities. Therefore, a unique place-based understanding of food systems is required. By understanding the interconnected nature of food system, we can better identify opportunities for improvement and innovation. This allows policymakers, communities, and stakeholders to develop informed strategies that promote equitable access to nutritious food, support local economies, and minimise environmental impacts. A deeper understanding of food systems also enables us to address issues such as food waste and resilience in the face of climate change and other disruptions. Therefore, engaging with communities to understand their specific needs and challenges is essential for developing effective and sustainable solutions.

HWQld commends the Discussion Paper for noting food security as a Human Right, the Right to Food. However, HWQld acknowledges that not all states and territories currently recognise this right to the same degree and suggests that this variability may need to be recognised in the National Strategy for Food Security in Remote First Nations Communities (the National Strategy). HWQld supports further consideration of the applicability of a Right to Food in relevant legislative instruments.

HWQld supports the six dimensions of food security outlined in the Discussion Paper (availability, access, stability, utilisation, agency and sustainability), which align with [Gather + Grow 2023-2032](#). However, HWQld suggests expanding the explanation of utilisation to include the behavioural element of food security. This would include acknowledging the requirement for individuals and families to have the awareness, knowledge, and skills to choose, store, prepare and consume a healthy diet.

Consultation Question: How could food security be improved in your community?

Improving food security with Aboriginal and Torres Strait Islander peoples requires a collaborative approach involving all levels of government, non-government organisations, and communities. Given the National Strategies strong alignment to the Close the Gap priority reforms, HWQld recommends adding to the underpinning principles and including enabling activities which would further strengthen this. HWQld suggests the following inclusions would strengthen the National Strategy:

Gather + Grow Enablers

- Collective leadership
- Knowledge translation
- Solution-driven investment

Gather + Grow Guiding Principles

- Community-centred
- Equity-informed
- Systems thinking

- Strengths-based approaches
- Sustainable solutions
- Respecting culture

HWQld recognises that while the National Strategy addresses many key factors affecting food security, it is HWQld's experience that a one-size-fits-all model is ineffective, given Australia's diverse communities. Collaboration across government agencies is crucial for success. Because of this, it is essential to respond to the unique needs of each community with evidenced-based, community-centred approaches. Strategies must be adaptable to accommodate the specific cultures, traditions, and lifestyles of different communities. The Discussion Paper does not clarify how the National Indigenous Australians Agency (NIAA) plans to ensure this adaptability and coordination. Inclusion of the above enablers and guiding principles may support this. HWQld makes the following additional recommendations to support an appropriate and effective approach to improved food security in Aboriginal and Torres Strait Islander communities across Australia:

- Coordinate and integrate cross-sectoral policies, priorities and programs that address food security and its determinants.
- Address food security and its determinants in the implementation of climate change strategies.
- Improve affordability of food through measures to increase income and reduce the cost of healthy food.
- Implement recommendations, and report on outcomes of, various recent inquiries relevant to food security.
- Improve monitoring and surveillance of food security and its determinants.

Consultation Question: What community strengths support food security?

The resilience of Aboriginal and Torres Strait Islander peoples is deeply rooted in cultural strength, traditional practices, and community solidarity. Despite facing challenges such as geographic isolation and limited access to resources, remote Aboriginal and Torres Strait Islander communities have sustained themselves. Innovations in agriculture and food production that respect and integrate traditional practices play a pivotal role in enhancing food security. Cultural values related to caring for Country and community further support resilience. HWQld suggest the National Strategy incorporate a more robust strengths-based narrative recognising the security, sustainability and health of traditional Aboriginal and Torres Strait Islander food-ways. Moreover, HWQld encourages further research on the resilience and coping strategies of Aboriginal and Torres Strait Islander communities facing food insecurity and incorporating these strategies into targeted interventions.

Consultation Question: What do you think of the Focus Areas in the Discussion Paper?

HWQld supports the Focus Areas taking a holistic view of health and wellbeing, recognising food insecurity as a complex issue requiring a multi-strategic approach. The Discussion Paper also highlights the need for collaboration among key stakeholders, including government, industry, health, and communities. Most of the National Strategy's Focus Areas align closely with those in Gather + Grow 2023-2032 and Closing the Gap. This alignment is documented in **Appendix 1**, which includes further feedback on the Focus Areas.

However, the large number of Focus Areas included in the Discussion Paper may dilute impact and focus. To harness a clear and targeted policy agenda, HWQld suggests reducing the number of Focus Areas through prioritisation with communities, while broadening their scope (where appropriate) and more clearly articulating the intention, definition, and differentiation of each area.

Consultation Question: What do you think of the Intended Outcomes in the Discussion Paper?

The Intended Outcomes are well-aligned with the targets of the National Agreement on Closing the Gap and are interconnected with other key strategies including Gather + Grow 2023-2032. HWQld commends NIAA for including outcomes that highlight the importance of focusing on factors beyond food supply and nutrition (e.g., education, employment, and financial independence). However, HWQld notes that the outcomes are ambitious, costly, and challenging to measure in the short term. Implementing these outcomes across all communities will

be challenging, necessitating considerable resources. HWQld notes that across jurisdictions, the target outcomes (and the agencies responsible for them), will differ significantly. HWQld is interested to understand how NIAA will resource efforts required to achieve outcomes in all states and territories.

The Discussion Paper does not currently include tangible, specific outcomes and intended timelines. To help address this, HWQld suggests considering the intended outcomes at multiple levels. For example, outcomes may look different at the system, community, and family/individual levels. HWQld encourages a multi-level approach to implementation and evaluation, similar to the [Gather + Grow Framework to Address Food Security in Remote Aboriginal and Torres Strait Islander Communities](#).

HWQld suggests it would be helpful to align outcomes with the definitions used in the Discussion Paper (page 6). HWQld suggests:

- The Healthy Focus Area would contribute to the utilisation domain of food security, rather than access.
- The description of sustainability as a target outcome (page 11) appears mismatched with the earlier definition of sustainability as a dimension of food security (page 6).
- Further explanation about food systems (what they are and how they impact food security) earlier in the document may provide additional clarity on the target outcomes. For example, a definition of the food system and its relationship to food security in the introduction. The 'food system' is mentioned for the first time under the target outcome 'agency'.

Consultation Question: What do you think of the Potential Actions in the Discussion Paper?

HWQld suggests providing further clarity on how the potential actions will achieve the intended outcomes. This would enhance transparency, guide delivery and facilitate better monitoring. In its current form, it is challenging to assess the feasibility and practicality of the proposed actions from the Discussion Paper.

The actions are relevant; however, it is not always clear how these actions will be practically realised. For example, it is unclear who is responsible for leading the different actions, over what time frames and where they will be delivered. HWQld understands the Discussion Paper is not intended as an implementation plan (and that implementation planning will be informed by community consultations), however, further clarification on how the efforts of the National Strategy will be coordinated would be helpful. For example, HWQld suggests including:

- Approximate timeframes for delivery of the National Strategy,
- Consideration of highlighting a staged approach to implementation. This could include an indication on which actions will be prioritised in the early phases of implementation, which will be on-going across the life of the National Strategy, and which are long-term goals.
- Stakeholder mapping to clarify the roles of different sectors in the National Strategy.

HWQld also suggests actions related to research and evaluation. Including actions related to this important enabler will help ensure the dedicated efforts required to mobilise systems and drive change are being accounted for. Such work is usually 'invisible' but vitally important to long-term outcomes.

The emphasis on sovereignty, community leadership and partnership are strongly supported. However, HWQld suggests it could be further strengthened by highlighting opportunities for community members, and other stakeholders, to actively participate in both the implementation and governance. Ensuring that communities play a central role in decision-making processes will enhance the effectiveness and relevance of the initiatives. For example, existing steering committees and local/regional decision-making groups across jurisdictions could be leveraged to ensure that recommendations are effectively communicated to the relevant coordination bodies. This will also help ensure that efforts within state and territories are developed and not duplicated.

Consultation Question: Is there anything important missing from the Discussion Paper?

HWQld recommends the inclusion of the following additional elements:

1. Detail on how NIAA will secure support and commitment from key stakeholders across all levels of government and within communities. This includes coordination mechanisms, specific structures/processes for example, overseeing and managing the National Strategy, implementation and monitoring. This omission makes it challenging to comment on the feasibility and potential impact of the proposed actions.
2. HWQld notes the proposed vision in the Discussion Paper '*Social, health, education, and justice equity through First Nations food security in remote communities*'. HWQld acknowledges that food insecurity is often an outcome of the lack of social, health, education and justice equity. Therefore, food security will be achieved when these contributing and interconnected factors are achieved (and vice versa). HWQld suggests that the Discussion Paper would benefit from better clarity on the relationships between action/s, focus areas, target outcomes and the overarching vision/agenda.
3. Policy coherence is crucial in an environment where strategies and policies are often developed but not fully implemented. To highlight this, HWQld suggests including a more comprehensive list of related strategies, with consideration of key state and territory agendas such as Gather + Grow 2023-2032.

HWQld also suggests including a broader range of case studies that recognise the breadth of food security work happening across all states and territories. HWQld would be pleased to contribute one or more case studies related to Gather + Grow 2023-2032 that link to several of the focus areas. Examples from Queensland include:

- Under policy, practice and governance: [Gather + Grow 2023-2032, its first Action Plan \(Gather + Grow Action Plan 2023-2026\)](#) and the Gather + Grow Steering Committee.
- Under Stores: [Gather + Grow Healthy Stores](#).
- Under Health: [Gather + Grow Healthy Communities](#).
- Under Supply Chains: [Gather + Grow Healthy Food Supply Chain Mapping Study](#).
- Under Family and Community Infrastructure: [Discrete Communities Planning Funding](#), Fare Share Meals for the Mob Program, Cape York Partnerships Mayhi Market.
- Under Country: Mornington Island Market Garden Feasibility Study.
- Under Housing: Queensland Health and Department of Housing, Local Government, Planning, and Public Works Healthy Housing Program.
- Under Healthy Economies: Department of Transport and Main Roads [Remote Communities Freight Assistance Scheme](#) and HWQld Diet Affordability Monitoring.

With respect to statistics and data:

- The source for some statements is not clear, for example, '*over 80 per cent of First Nations people in some very remote communities*' experience food insecurity, '*poverty in remote First Nations communities is the greatest contributor to food insecurity*' and '*there has been some incremental progress towards improving food security over the past twenty years*'. Inclusion of relevant and up to date references throughout is recommended.
- HWQld suggests including more nationally representative statistics or balancing out some of the Central and Northern Australian data with other states and territories.
- The health impact section could be strengthened by framing data and statistics around the health outcomes of poor diet and food insecurity.
- HWQld suggests bolstering a strengths-based narrative by ensuring statistics about inequities are contextualised with acknowledgement of the broader systems, and on-going impacts of colonisation, that have perpetuated and continue to reinforce inequity.

- Evidence from remote Aboriginal and Torres Strait Islander communities indicates that [healthy diets are more affordable than the usual dietary pattern in communities](#). There are many reasons communities choose takeaway/convenience foods that have poorer diet quality. For example, absence of functional health hardware in homes (e.g. fridges), large families/households and food sharing practices, the high out-of-pocket expense to buy ingredients, and lack of meal planning/budgeting skills. Affordability is an important driver of food security, but it is not the only factor impacting dietary patterns. A further interrogation of the evidence is suggested to unpack the many factors impacting diet choices is recommended.

Evaluation Feedback

HWQld acknowledges the importance of evaluation and measuring impact as part of delivering any strategy or initiative. Given previous efforts to address food security in remote Aboriginal and Torres Strait Islander communities have had limited sustained impact in the past, it is particularly relevant to include strong evaluation and accountability mechanisms. HWQld is currently progressing work to deliver this in Queensland and welcomes on-going discussion with the NIAA to share opportunities, learnings, and alignment.

Additional information would be required on timeframes, outcomes, resources, and governance to enable specific comments on planned evaluation. Further information on how the underpinning principles were developed, and how they will be applied, would also be beneficial. HWQld supports the capture of data that is strengths-based and meaningful to remote Aboriginal and Torres Strait Islander communities and recommends this is prioritised. HWQld has no concerns with the proposed three-yearly evaluation cycle, however notes that the evaluation of the 10-year implementation period will necessitate the collection of broader related food system measures, as well as a combination of quantitative and qualitative datasets that remain flexible to adapt to local circumstances over time. This may mean that progress within Focus Areas may be at different stages and vary between locations (including learning feedback loops). Measures will likely vary across and even within jurisdictions.

Reducing the number of Focus Areas and including clear measures that will be used to demonstrate change would strengthen this section. HWQld suggest this should be further developed in consultation with remote Aboriginal and Torres Strait Islander communities. Many of the measures required to demonstrate impact are currently not routinely measured. Some may not have well established indicators. This should be considered as part of the evaluation and implementation plan with priority given to measures that reflect community perceptions of success. Some measures may require new tools and data collection efforts. Where possible, these should be integrated with existing national surveillance data. In addition, data should be made available at the state/territory or even intra-state/territory level so that findings may be interrogated in meaningful ways to state/territory and community stakeholders. Actions currently listed in the Policies, practice and governance Focus Area could be leveraged to support evaluation development and reporting.