

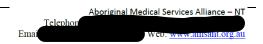
# Aboriginal Medical Services Alliance of the Northern Territory (AMSANT)

# Online submission to the National Strategy for Food Security in Remote Indigenous Communities

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#### Introduction

AMSANT is the peak body for Aboriginal Community Controlled Health Services (ACCHS) in the Northern Territory (NT). Our members provide comprehensive primary health care from Darwin to the most remote area of the NT. The ACCHS sector is the larger of the two providers in the Aboriginal primary health care system with the other provider being the Northern Territory Government. ACCHS have a key role in advocacy and policy areas related to health including the social determinants of health, alongside their role as a health service provider.

AMSANT and its members understand that food security is a key issue affecting the health and well being of Aboriginal communities. AMSANT has held two food summits (in 2011 and 2021) with the second was held in partnership with the Central Australian Aboriginal Congress, NPY Women's Council and NT Council of Social Services. This Food Summit resulted in a comprehensive report based on two days of deliberations as well as preceding community and stakeholder consultation. The Food Summit reports were endorsed by the AMSANT board with their recommendations covering most of the key areas in the NIAA discussion paper. The 2021 Food summit report is attached to this submission.

# Food insecurity is a health and social crisis in NT remote communities right now.

Unaffordable, poor quality healthy food drives consumers to choose cheaper, processed and unhealthy food. Low household incomes (exacerbated by household overcrowding), high cost of living and inadequate government payments create a 'binge-bust' eating pattern where people rely on unhealthy ready to eat food when money becomes available, then live with hunger for periods of time. 'Binge-bust' eating patterns are associated with developing metabolic conditions like obesity and diabetes. After generations of poverty and food insecurity, Aboriginal people in remote NT now have the highest rates of diabetes in the country and the world. Moreover, diabetes is appearing in younger and younger children (one study reported children as young as four years with type 2 diabetes). Epigenetic susceptibility to poor health has emerged among a generation of children whose mothers had Type 2 or gestational diabetes during pregnancy. Youth-onset diabetes is aggressive in its course, and people in their twenties are being hospitalised needing amputations or dialysis for kidney failure. The health consequences of food insecurity in remote communities has been well covered by the Discussion Paper and are leading to devastating consequences.

# Currently, food security is not within the community's control.

High rates of food insecurity are directly related to dispossession and ongoing impacts of colonisation including limited or no access to traditional lands. The impact is ongoing with a failure to invest in remote communities over many decades causing poor social determinants of health such as overcrowded and poorly maintained housing. The current cost of living crisis is impacting most heavily on remote Aboriginal people. Climate change is compounding high rates of food insecurity with both increased frequency and severity of weather related events that are causing extreme disruption to supply chains particularly in



Northern Australia. A decolonising approach requires communities to have as much control as possible about this critical issue for people's health and well being. Although there are some community controlled organisations specialising in food (retailing, production etc), the solutions overall have been government driven with insufficient power sharing. At its most extreme, the lack of control is exemplified in food security issues caused by natural disasters, where there are few avenues for local affected people to have a say despite Aboriginal people having a deep knowledge about their country. It is a risk that ongoing crisis caused by climate change will encourage a 'command and control' approach. In looking to solve food insecurity, the Strategy must explicitly acknowledge colonisation and take a decolonising approach that is aligned with Close the gap principles. Urgent action is needed but this is not an excuse for governments to act unilaterally as has so often happened. Long term reform is also required, and this requires sustained commitment to real partnership.

In the hub and community consultations that AMSANT attended, it was commonly raised that participants had raised many of these issues and solutions before and yet little has happened. Participation in some of the hub and community consultations was quite low and some of this may relate to a weariness and cynicism about whether change will result from this strategy. It is critical that government and partners do not let communities down and work in partnership with Aboriginal and Torres Strait Islander organisations, leaders and communities to address this urgent problem.

How this Strategy is implemented will be critical to its success. Below are some key principles;

- 1. Closing the Gap principles must be incorporated into the governance and implementation of the strategy, particularly building the community controlled sector and shared decision making. This requires funding community controlled partners and community representatives to participate as equal partners.
- 2. **Social Determinants of Health** in the strategy that contributes to food insecurity must be addressed particularly poverty.
- 3. **Place based funding models** must be implemented within the strategy with evaluation plans being flexible enough to allow individual communities to tailor the Strategy to their needs. Place value on developing connections and trust with remote communities.
- 4. **Action based** to avoid unnecessary feasibility studies or pilot projects. Projects within the Strategy must be designed to have an impact during design and planning as well as delivery for example, employing community members or/and incorporating skill building into community participation (including governance roles).
- 5. Embedded continuous quality improvement (CQI) and a capacity building approach (not a punitive approach) to support communities to improve their food security, not penalise them for not meeting targets.
- 6. **Data sovereignty plan** data collection and storage must be designed according to Indigenous data sovereignty principles. Any task within the Strategy should include in its



beginning a plan to provide the involved community with ongoing and suitable communications.

# Poverty as a determinant of food security

#### Introduction

Poverty and food security are closely linked, especially for Aboriginal populations. Addressing food security without poverty reduction severely limit effectiveness, particularly in remote communities where the cost of living is particularly high (Australian Institute of Family Studies 2023). Indigenous Australians, particularly in remote areas, experience significantly higher poverty rates than non-Indigenous Australians. In Central Australia, 50-75% of Aboriginal households live below the poverty line, facing severe economic hardship (CLC 2024b). Food prices in remote communities are 40% higher than in urban areas, worsening food insecurity (NIAA 2020, Markham 2023).

Income levels directly influence food security. Households with limited financial resources struggle to afford healthy food options, leading to higher rates of food insecurity. During the COVID-19 pandemic, a doubling of unemployment benefits and emergency financial relief programs significantly improved food security among low-income households, demonstrating that increasing household income can effectively mitigate food insecurity (Foodbank Hunger Report 2021). In the NT, stores reported increased sales of healthy food (Pers Comm Arnhem Land Progress Aboriginal Corporation (ALPA)).

Unemployment benefits are inadequate to support a dignified life and leave most people in deep poverty even in urban areas. We support the CAAC recommendation that unemployment benefits are increased to 90% of the aged pension.

#### The Role of the Remote Area Allowance

The Remote Area Allowance (RAA) is a supplementary income support provided to individuals living in designated remote areas. The current RAA payment is grossly inadequate. As of December 2023, the RAA provided \$9.10 per week for singles and \$15.60 per week for couples—amounts that have not been adjusted for inflation in over two decades (Markham et al 2019, Markham 2023, CLC 2024a). The high cost of living in remote areas means that the RAA only provides a marginal increase in income support, failing to address the severe economic challenges faced by those living in these areas (Markham 2023).

Remote people face many barriers to accessing government benefits (language, distance to regional centres, lack of social workers in remote areas) and past punitive policies have meant that many people have lost access to benefits that they are entitled to. Centrelink should increase outreach to remote communities so as to make their services accessible and ideally, provide access in a culturally safe space such as an ACCHSs.



#### **Policy Recommendations**

To effectively address food insecurity in remote Aboriginal communities, it is essential to implement poverty alleviation measures, including a substantial increase in the Remote Area Allowance. The following recommendations are proposed:

- 1. Increase unemployment benefits to 90% of the aged care pension and increase the Remote Area Allowance: The RAA should be increased to reflect the actual cost of living in remote areas. This increase should be substantial and should include provisions for regular indexation to ensure that it continues to meet the needs of those living in remote communities.
- 2. **Integrate Poverty Reduction Strategies into Food Security Initiatives**: ensure that community participants involved in the food security strategy implementation are assisted to be more food secure themselves, with adequate payment for their time and local knowledge/formal employment/assistance with navigating income support payments.
- 3. **Improve access to Centrelink services** so people can better access services that they are entitled to.
- 4. **Support for Community-Led Solutions**: Community participants in policy development have local knowledge to incorporate into successful policies. This local knowledge should be the priority in policy development.

The relationship between poverty and food security is clear: without addressing poverty, food security strategies will have limited impact. The Remote Area Allowance, as an existing government mechanism, offers a pathway to alleviate poverty in remote communities if it is reformed to meet the actual cost of living. By increasing the RAA and implementing broader poverty alleviation measures, we can make significant strides toward ensuring food security for remote First Nations communities in Australia.



# **Recommendations by Focus Area**

# 01 Healthy Economies

As noted above, poverty reduction is fundamental to improving food security.

# **National Sugar Tax**

A national sugar tax with funding being used to improve food security is a key recommendation for AMSANT, A national sugar tax has a strong evidence base particularly for reducing consumption of soft drinks and also for incentivising manufacturers to reduce sugar content in soft drinks. Other countries such as the United Kingdom and Mexico have successfully introduced a sugar tax (Duckett et al, 2016). High soft drink consumption has a direct link to obesity and diabetes and provides absolutely no nutritional benefit. We support the CAAC submission which makes a well referenced argument for a sugar tax and healthy food subsidy.

A tax alone without an accompanying reduction in healthy food prices could worsen food insecurity particularly whilst water palatability in many communities is poor. The sugar tax therefore has to be accompanied by effective measures to reduce the price of healthy food in stores. Healthy food should include fruit and vegetables but also staples such as milk, . healthy cereals (with limited added sugar),eggs, meat and other key elements of a healthy diet. Some stores are already cross subsidising healthy food by increasing the cost of unhealthy food. However, there are limits to how much stores can do in this area without substantially reducing profitability and this strategy has largely been limited to reducing the cost of fruit and vegetables. The reductions in healthy food prices that stores can be achieved by cross subsidisation still leave these items substantially more expensive than in regional supermarkets. Therefore, stronger national action is required. How the reduction in healthy food costs is achieved needs further examination so that the benefit is provided to remote community residents rather than stores or freight companies.

The subsidy on healthy foods should aim to bring the cost down to prices in Darwin or Alice Springs supermarkets (Brimblecombe et al, 2017). A large trial of a 20% discount on healthy food found a meaningful but quiet modest impact on consumption of fruit and vegetables. The price of fruit and vegetables was still higher than Darwin supermarkets with 20% reductions. The authors concluded that a larger discount may have been more effective. A 50% reduction was needed to bring the prices down to those in regional supermarkets (Brimblecombe et al, 2017).

### Takeaway meals

Takeaways are a large part of people's diets. In the recommendation on food production, production of healthy ready to eat meals (stews, healthy frozen meals etc) for remote communities could occur in larger communities or regional towns, creating jobs for



Aboriginal people whilst improving dietary practices. To make these foods affordable, a government subsidy should be provided to lower prices.

#### Recommendations

- 1. **Review and Adjust the Remote Area Allowance (RAA):** Prioritise reviewing the RAA to ensure it meets the higher cost of living in remote regions. Introduce a tiered model for remoteness to ensure that those in the most remote areas receive an allowance proportional to their expenses. The review should be done immediately given the cost of living crisis and implementation should occur urgently.
- 2. Increase unemployment benefits to 90% of the aged care pension.
- Establish a national sugar tax, using the revenue to subsidise healthy foods and improve access to drinkable water. This tax should be accompanied by measures to reduce healthy food prices, ensuring that the benefit reaches remote community residents.
- 4. **Expand Remote Employment and Training Programs:** Increase remote training and employment opportunities conducive to improved food security, income, and health outcomes. This includes supporting First Nations Community-Controlled Registered Training Organisations to deliver accredited and locally appropriate training.
- 5. **Enhance Social Support Packages:** Ensure that social support packages for remote residents include necessary provisions to meet food security and dietary needs, particularly for those receiving home care or disability support.
- 6. **Increase Centrelink Services:** Expand Centrelink outreach in remote communities to ensure residents receive the benefits they are entitled to, such as unemployment, disability support, and aged care benefits. Direct access to Centrelink staff will help address gaps in benefit distribution.

#### **Proposed Intended Outcomes**

We agree with the following outcomes, noting that increased reasonable paying jobs with career advancement (which could be in the food industry or outside of that industry) will improve food security:

- **Improved Food Security:** Ensure that food security is addressed through increased income and employment opportunities, alongside the adjustment of social security policies to reflect the realistic additional costs of living in remote areas.
- **Sustainable Employment:** Foster sustainable employment and business opportunities within the remote food sector, with a focus on community-led initiatives and partnerships with industry.

#### **Potential Actions**



- Evidence-Based RAA Adjustment: Conduct a comprehensive review of the RAA, ensuring it is aligned with the true cost of living in remote regions. Develop a robust evidence base to support appropriate payment levels and implement the increased payments as soon as possible.
- **Increased unemployment benefits** to 90% of the level of the aged care pension.
- **Subsidise Healthy Foods:** Implement effective subsidies on healthy foods to bring prices in line with those in urban supermarkets. Ensure that these subsidies benefit remote community residents directly. Include healthy takeaways in these subsidies.
- Partner with Communities: Collaborate with First Nations communities to develop and implement flexible remote training and employment programs that enhance food security and nutrition outcomes. Support the development of community-controlled food production businesses, ensuring they are sustainable and meet local needs. This should include consideration of production of healthy pre-prepared meals.

# 02 Country

It is absolutely critical that this area is community led. As written, the actions and priorities suggest that an external agency such as government would be working with communities to make these actions happen. The actions should be rewritten in such a way that it is clear that the community is in charge and is making decisions. There have been many examples of external initiatives that have had little buy in and have not worked including community gardens and other food production programs. The process of decision making and the way that projects are implemented is critical to success or failure. The first action (work with communities to develop locally relevant, accessible information and training resources to increase traditional and other on-Country food sourcing, production, processing, and distribution) could be implemented in a way that is community led and which respects and honours Aboriginal people's authority over their own country and their intellectual property or it could be undertaken in a way that disempowers communities, it does not recognise local authority structures and where their own intellectual property is used for other people's gain. Similarly, the last action "develop mechanisms to ensure Elders and other knowledge holders are supported to build and maintain community knowledge and capacity of traditional food sourcing, preparation, and consumption" should be rephrased so that it is clear that communities are deciding whether this action is needed (it may not be) and how they want to go about this. It is clearly not for government to decide if this action is warranted – only communities will know this.

Training and information may not be what is required to build peoples capacity to access traditional foods – it might be lack of vehicles or money for weapons/ammunition which could be remedied with some flexible funding. Therefore an additional action could be for "communities to be provided with flexible funding through ranger or other schemes to increase access to traditional foods". There are good examples of this occurring , but there are also examples where changes to government policy (e.g. change from Community Development Employment Program (CDEP) to Remote Jobs and Economic Development



(RJED) has undermined local programs such as Maningrida Wild Foods that is now struggling, as one program (CDEP) winds down whilst another one (RJED) has not started.

Non traditional food production, and commercial traditional food production will often require external expertise. But the external expertise must be under the control of the regional /local governance mechanism and the appropriate local Aboriginal people must control knowledge and intellectual property related to traditional foods. Furthermore, if communities do wish to enter into commercial ventures based on traditional foods, they should be supported to ensure that their intellectual and cultural property is protected. There are good examples of non traditional food production such as CentreFarm that work with Land Councils to build viable agricultural enterprises but again, there have also been failures and mainstream agricultural initiatives that employ backpackers instead of Aboriginal people. The actions do not say who the external partners in the actions are, but we believe that the actions are much more likely to be successful if Aboriginal organisations are funded to do this work as they know how to really listen to communities.

We suggest that this is rephrased to make it clear that communities and regional governance groups are making choices about what outcomes are important to them and what actions they want to pursue

#### Recommendations

- 1. Place based priority setting by communities and regions to ensure that communities and regions are in control of setting their own priorities through robust Aboriginal governance. External agencies, including government bodies, should support rather than dictate these initiatives, ensuring that the decision making process and implementation are community led.
- 2. **Involve Appropriate Aboriginal Organisations:** Engage Land Councils or other relevant Aboriginal organisations in each region when working with communities. This ensures that projects are developed and executed in a culturally appropriate manner, respecting local authority structures and intellectual property. It is also aligned with Closing the Gap principes for Aboriginal organisations.
- Provide Flexible Funding to communities through Ranger or other schemes to increase access to traditional foods. This funding should be adaptable to local needs, such as providing resources for vehicles or tools necessary for traditional food sourcing.
- 4. **Protect Intellectual and Cultural Property** to support communities that wish to enter into commercial ventures based on traditional foods, ensuring that their intellectual and cultural property is protected. External expertise should be under the control of regional/local governance mechanisms, with Aboriginal organisations leading the initiatives.



# **Proposed Outcomes**

- Enhanced Land and Sea Management: Increase First Nations land and sea management activities to ensure the health, diversity, and resilience of environments, supporting stable wild food sources and reducing threats from climate change.
- Sustainable Local Food Production: Boost sustainable local food production initiatives, including traditional hunted and harvested foods, as well as other locally grown food enterprises.
- Intergenerational Knowledge Sharing: Support the sharing of food and nutrition knowledge across generations and communities, including the development of intercommunity food trading and business networks.

#### **Potential Actions**

- **Develop Local Resources:** Offer community resources and support (through partnering with an Aboriginal organisation of their choice) to work out what is needed to t enhance traditional and on-Country food sourcing, production, processing, and distribution.
- **Expand Land and Sea Programs:** Broaden Land and Sea Management Programs to map, protect, and sustainably manage traditional food sources.
- **Support Food Production Businesses:** Assist communities in identifying opportunities and establishing First Nations-led traditional foods production businesses, such as market gardens or other food industries like agriculture and aquaculture. This includes providing startup loans and governance support.
- Implement Food Processing Models: Collaborate with communities to develop and implement effective, sustainable models for local food processing and preparation, including the necessary infrastructure.
- **Build Food Distribution Networks:** Help communities create and maintain networks for the safe distribution of locally sourced, produced, and processed food.
- **Support Elders and Knowledge Holders:** Provide resources to assist Elders and other Knowledge holders to maintain and build community knowledge and capacity related to traditional food sourcing, preparation, and consumption.

#### 03 Health

Aboriginal Community Controlled Health Services (ACCHSs) provide comprehensive primary health care that goes beyond clinical services to include health promotion, public health, and advocacy. Health promotion, as defined by the Ottawa Charter of Health Promotion, involves much more than just health education, which focuses on increasing



healthy behaviours through knowledge. The five key areas of health promotion also include building healthy public policy, creating supportive environments for health, developing community action for health, and reorienting health services toward prevention and community involvement.

Unfortunately, health promotion is often reduced to just health education. However, it is crucial that health promotion efforts are intersectoral, community directed, and utilize multiple strategies, following the Ottawa Charter model. In the context of deep poverty and high food prices, health education alone has limited impact. To make meaningful progress, it is essential to address the structural barriers to good nutrition that many communities face.

While some ACCHSs are resourced for both public health nutrition and dietetics, none are resourced to the scale needed given the extremely high rates of nutrition-related diseases. Additionally, no ACCHSs are currently resourced for a local Aboriginal nutrition workforce, and there are no training or support pathways in place for this workforce. A two-way approach, grounded in a strong cultural foundation, is much more likely to be effective than non-Aboriginal health professionals working in isolation, regardless of their good intentions. Some actions focused on particular age groups-e.g. young children, Health should be resourced to provide public health nutrition and dietetics support to the whole community and although young children are a high priority group, there is high needs across all age groups.

#### **Recommendations**

- 1. **Integrate Health Sector in Intersectoral Action:** Ensure that the health sector, particularly Aboriginal Community Controlled Health Services (ACCHSs), is centrally involved in all intersectoral actions aimed at improving food security. This includes collaboration with sectors such as education, stores, and aged care.
- 2. **Resource ACCHSs Adequately:** ACCHSs should be sufficiently resourced to deliver and evaluate both population level and individual level nutrition services. This includes public health nutrition, dietetics, and the development of a local Indigenous nutrition workforce.
- 3. **Prioritise Community Control:** Transition the remote primary health sector to community control, ensuring that community leadership is prioritised in the design, delivery, and evaluation of all dietary health care.
- 4. **Develop a Nutrition Workforce Pathway:** Establish a sustainable, adequately funded vocational pathway for a First Nations nutrition workforce, linked to ongoing employment within the community-controlled health sector.
- 5. **Incorporate Indigenous Knowledge:** Ensure that Indigenous perspectives and knowledge are integrated into remote health and nutrition training programs, with a focus on culturally appropriate methods.



# **Proposed Outcomes**

- Adequately Resourced Nutrition Services: Nutrition education and comprehensive health promotion programs in remote communities are adequately resourced and supported across the lifecycle.
- **Sustainable Health Workforce:** A sustainable, Indigenous led nutrition and health workforce is established, providing preventative and specialised dietary health care in remote communities.
- Community Leadership in Health Care: Community leadership and control are prioritised in the design and delivery of all health and nutrition initiatives in remote communities.

#### **Potential Actions**

- **Build a Sustainable Workforce:** Implement recruitment, retention, and career progression strategies to establish a sustainable Aboriginal and Torres Strait Islander nutrition and health workforce in remote communities.
  - Collaborate with Universities and First Nations Registered Training Organisations to develop a vocational First Nations nutrition workforce pathway.
  - Engage with local employment service providers to ensure that remote community members have opportunities to pursue careers in the health and food sectors.
- Enhance Professional Development: Provide professional development that aligns with the Aboriginal and Torres Strait Islander Community Controlled Health model of care.
  - Integrate First Nations perspectives into remote health and nutrition training programs.
- **Strengthen Nutrition Education:** Enhance the provision of comprehensive and culturally appropriate nutrition and life skills education in schools, employment service activities, and training opportunities.
  - Consider using models like the Medical Yarn-Up/Shared Medical Appointments currently being trialled in the NT.
- **Improve Referral Systems:** Strengthen formal referral systems to ensure that client dietary needs are met in multi-disciplinary care settings, such as between remote health services and aged care facilities.
- Transition to Community Control: Transition non-ACCHS remote health services to community control, ensuring that community leadership and control are central to all health and nutrition services.



• **Revise Support Programs:** Review and adjust existing support programs to ensure that they meet the needs of the broader community across the lifecycle including more vulnerable/high need groups such as expectant parents, young children and elders, within a community-controlled model.

# 04 Housing

#### Recommendations

- 1. **Ensure Reliable Power Supply:** Address the issues related to the pre-paid Power Card system, which leads to frequent power outages, unreliable refrigeration, and higher costs for Aboriginal communities.
- 2. **Ensure that all communities have safe and palatable water:** While ensuring access to safe water is crucial, also advocate for the provision of palatable water, which is essential for promoting health in remote communities. This includes engaging in government and industry spaces responsible for water provision to ensure water quality meets standards of taste, odour, colour, and hardness.
- 3. **Support Culturally Responsive Housing:** Remote housing policies and programs should be designed to align with the food security, cultural, family, and health needs of remote communities. This includes considering housing layouts that support cultural practices, reduce overcrowding, and allow for the growth of plants and trees.

#### **Proposed Outcomes**

- Culturally Appropriate Housing Design: Remote housing policies and programs deliver housing that is appropriately designed, built, renovated, and repaired in line with the food security, cultural, family, and health needs of remote communities.
- Adequate Food Preparation Facilities: Remote community housing has the appropriate level of food preparation, storage, and cleaning equipment to maintain food security and hygiene.
- **Prioritised Access to Resources:** Remote household access to reliable and affordable power and safe water is prioritised, ensuring that these resources are provided based on need rather than population size.

#### **Potential Actions**

- **Build Evidence for Housing Policies:** Develop resources and a strong evidence base to support the inclusion of co-designed conditions with communities in remote housing policies and programs to support food storage and meal preparation.
  - Collaborate with the Australian Bureau of Statistics to review and update the Community Housing and Infrastructure Needs Survey in partnership with First Nations Housing Peaks, assessing housing for food security needs.



- Analyse the network of agencies responsible for food utilisation in remote homes and support strong collaboration with First Nations Community Controlled Organisations to improve service delivery and coordination in housing and maintenance.
- Support remote housing providers to co-design and maintain food storage and cooking facilities with communities at appropriate standards for food security.
- Establish a Local Housing Maintenance Workforce: Support the establishment and resourced delivery of an effective, locally based First Nations housing maintenance workforce to ensure ongoing maintenance and repairs are culturally and practically appropriate.
- Provide Reliable Electricity: Ensure that affordable, safe, and reliable electricity is
  provided in all remote community housing based on need, not population size.
  Consider alternatives such as solar power installations to enhance reliability and
  reduce costs.
- Advocate for Safe and Palatable Water: Engage in advocacy to ensure that remote communities have access to safe and palatable water, with efforts focused on addressing both water safety and quality.

Although supply of electricity and safe palatable water could be viewed as being outside the food security space, these fundamental services clearly have a major impact on food security.

#### **05 Families and Communities**

#### **Recommendations:**

We agree with the NIAA Food Security Discussion Paper ('Discussion Paper') regarding the Outcomes and Actions around providing community shared infrastructure. For example, during the Darwin Hub consultation, consultees identified that a community-based food storage facility could be used to freeze down fish as well as pre-cooked meals for cyclone season.

However, the provision of community infrastructure needs to be in conjunction with, not a replacement for, households being fitted with meal preparation, cooking and storage facilities—as noted in the Housing section of this submission.

We also agree with the Discussion Paper about the Outcome "Ensure locally and culturally appropriate food relief is available and accessible in remote communities". However, if food security is not reduced by poverty reduction and addressing high costs of food, food relief will entrench a charity model that can disempower people and categorise people as more or less deserving (e.g. a woman with young children may be prioritised or an elder but a single man may not be, yet all are hungry and need food).



#### **Food Relief in Remote Communities**

We also agree with the Remote Healthy Store Coalition that NGO's such as Food bank are not the appropriate model for food relief in remote communities – this needs to be community directed and preferably be provided by stores. It is a risk that very high demand for food relief, exceeding local supply will be difficult for stores to manage without causing community friction. The solution is to reduce food security at a population level and then food relief can really be for individuals /families in special circumstances. At current levels of food insecurity, food relief would be required by many families on a weekly basis which is clearly not sustainable.

It is likely that in an environment where food security is an issue, for the majority of people, it would not be acceptable to provide an intervention for a selective group while others go hungry. We recommend that initiatives are inclusive of the whole community, with the option for a stronger focus on children or other vulnerable groups. For example, we recommend removing the age group restriction in the sub-Action "Develop financially accessible solutions to provide culturally and dietary appropriate meals for First Nations children and young people".

## **Food Security and Youth Justice**

We agree with the NTG submission's assertion that hunger/food insecurity is likely to be contributing to youth crime. Addressing food security and other social determinants such as housing particularly for disenfranchised young people is likely to impact on crime more than many of the law and order policies currently being ramped up. Incorporating food security into youth programs as well as ensuring families are receiving appropriate Centrelink benefits could reduce food insecurity in young people.

#### **Environmental Disaster Related Food Relief**

The need for emergency supplies in remote NT is a regular need during the wet season, when severe weather events such as cyclones and floods can leave remote communities cut off from road supplies. This is fundamentally different from emergency relief targeting individuals/families in difficult circumstances. While remote stores such as ALPA plan for this contingency, the wet season (and the period that emergency supplies is required) is becoming longer and more unpredictable (as reported during the Darwin Hub consultation). Stores do not have adequate storage capacity for food.

Food relief (which is an emergency measure activated by the NT government) can mean flying food into remote communities every day for months, each year – this is not sustainable but suggests there needs to be major upgrades to infrastructure to allow better transport as well as increased storage. It is also crucial to note that when communities are cut off due to severe weather, the staff working in health services and other service sectors are also dependent on food relief.



# Delivery of community-led education and skills development

In regard to the Discussion Paper action "Deliver community-led education and skills development linked to food security and nutrition outcomes, such as budgeting, cooking and food hygiene." As already noted, health education will have limited impact and can be experienced as disempowering due to unrealistic expectations of food insecure populations living in overcrowded houses with poor facilities for storing and cooking food. This action is only useful if there are actions on the social determinants of health so people can realistically buy food to cook, noting that a ethnographic study in the APY Lands found cooking for many families was unrealistic due to poor housing and food being eaten on the day it was purchased making preparing meals very difficult (Bryce et al 2020).

## **Proposed Outcomes**

- Adequate funding for community led shared infrastructure such as transport, meal
  preparation and service areas, and storage; including facilitating partnerships between
  community members and owners of existing facilities (e.g., stores, community
  kitchens).
- Ensure food services provided by remote social, education and community care services meet dietary and cultural needs of participants.
- Ensure locally and culturally appropriate food relief is available and accessible in remote communities.

#### **Potential Actions**

- Introduce a flexible fund to support place based food security projects in remote communities, community-led and tailored to local need. The fund could support projects such as sustainable power, storage solutions, transport, local food production, and ongoing maintenance.
- Support communities to work with service providers to ensure foods served by community-based programs, such as aged care, meet the dietary and cultural needs of the participant.
  - Assess service provider food-storage, preparation, and cooking facilities; provide support where required for facilities to meet community needs and requirements of the Food Standards Code.
  - Facilitate collaboration and coordination between locally grown food programs, community care services and stores
  - Develop financially accessible solutions to provide culturally and dietary appropriate meals for First Nations people requiring additional support.
  - Work with Aboriginal organisations and communities and the governance committee for the strategy to analyse the emergency relief food system in remote communities (where it exists). Partner with remote communities and



- stores, to implement suitable, culturally appropriate relief models for remote contexts, whilst also addressing the underlying causes of food insecurity.
- Support communities to establish community led food relief systems and undertake awareness campaigns on how these services can be accessed.
- Deliver community-led education and skills development linked to food security and nutrition outcomes such as budgeting and cooking. Support communities to take intersectoral action to address the determinants of poor food security and work with communities to empower them to take action on these determinants.

#### **06 Stores**

#### Recommendations

# **Development of a National Industry Code**

AMSANT supports the recommendations for the Stores focus area made in the submission by the Coalition for Healthy Remote Stores. In particular, we support the development of a National Industry Code (with inclusion of takeaways) with a strong monitoring and evaluation framework. We also support policies to reduce promotion of unhealthy foods and disincentivise purchase of unhealthy foods while implementing healthy food discounts instore. We stress that increasing prices on unhealthy foods will serve to worsen food insecurity and poverty, unless it is paired with subsidising healthy foods.

A code is only useful if stores are encouraged to meet and exceed it. For some stores, meeting the code will be difficult (particularly for smaller less viable stores) and upgrading infrastructure or increasing the range of foods they stock as required by a code may put upward pressure on prices. There should be flexible funding available to assist stores to meet the code if they are struggling (e.g. with storage space or policies). For stores that have met the code, funding to improve even further and offer extended services, health promotion or additional services (e.g. home delivery to vulnerable people) should be available. Additionally, we provide the following recommendations and comments.

# **Promoting Community Controlled Stores**

While we agree with the Outcome "Support remote stores to remain viable and provide affordable, healthy food whilst retaining and promoting community participation and control (Closing the Gap Outcome 17)", we strongly recommend that this Outcome has a focus on transitioning remote stores to community control. Community controlled stores have greater accountability to, and engagement with, their community. AMSANT has previously developed a proposal to transition Outback Stores to community control, using the existing group model for improved purchasing power and implementing a shareholder structure to elect community members to board and director roles, which would improve community involvement in the governance and direction of these remote stores. There are anecdotal reports that when Outback Stores takes over store management, the board of the store is

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disempowered. Another option would be to allow ALPA and other community controlled store organisations to take on the functions of Outback Stores such as supporting financially non viable stores so that Outback Stores is no longer required- this may take some time.

We recommend adding the Action "Support independent remote stores to develop group buying strategies, shared resources and infrastructure". NT Market Basket data show that independent stores have higher food prices that group-owned stores, and where stores are able to benefit through group buying and logistics, the price of food to consumers improved. This will need some government funding. This issue was addressed in the AMSANT 2021 Food Summit.

#### **Stores and Place Based Disaster Resilience**

We welcome the Outcome "Support adequate remote store infrastructure, storage, power, and disaster resilience to ensure continuous supplies of food and other essentials in remote communities". During the Darwin hub consultation, representatives from the Katherine region shared that they need upgraded infrastructure in remote stores to better prepare for severe weather/cyclone season, which is becoming longer each year. We recommend working with the NT government to address infrastructure needs of stores so that there is adequate food supply for vulnerable communities. Stores can not be expected to fund this – it requires government support. If expanded storage is made into a standard without funding, food prices will increase even further.

In addition, we support the Action "A nationally consistent response for remote community stores to access essential support and provide food and other essential groceries during crisis, unplanned or extended supply chain interruption, and seasonal isolation". The Coalition for Healthy Remote Stores has included in its submission some proposed principles for a funding model to support remote stores during extreme weather events. Additionally, we note that charity organisations like Foodbank and Second bite have been mentioned as forming a part of the disaster response. We caution against reliance on a charity model for regular severe weather events, as this could lead to entrenching dependence on charities rather than building community control over food supply. It is also a right that citizens should expect that governments will support them during a severe weather event — this is a core government responsibility. Also of note, these organisations are not community controlled and do not have the local cultural understandings of community based organisations.

#### **Building Individual Store Capacity**

We support the Action "Provide access to support for financially unsustainable stores identified as an essential source of food and groceries, allowing for flexible community-led store management". Community-controlled organisations like ALPA and Mai Wiru are best placed to provide this support (even to independent stores that are not community controlled), and therefore we recommend that funding be allocated to these organisations to do this work. At present, Outback Stores provides most of this support which is not in line with CTG principles, unless Outback stores transitions to community control.

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We support the Outcome "Provide tailored, accessible support for community led First Nations store governance, management and staff capability (local workforce)" and the associated Action "Provide assistance and incentives, where required, for First Nations store owners, managers and Boards to develop remote store policies that support food security outcomes, e.g., store employment, nutrition and pricing policies, financial management and governance practices". These should fall under the proposed National Industry Code.

A store manager is a critical quiet difficult role. A 1996 study found that the quality of the store manager had a direct influence on nutrition in the community (Lusch et al 1990). Specific easily accessible training for store managers including on nutrition, stakeholder engagement and community development would be useful. It has also been suggested that there should be a registration process for store managers as this is such a critical role and rogue managers can cause a lot of harm. This may be difficult but should be considered.

The NIAA's recognition of the need for a community based food security workforce is commendable. AMSANT has long called for the expansion of such a workforce, particularly in remote areas where food security challenges are most severe. This workforce should be culturally grounded and supported with adequate training and resources. By investing in a local workforce, the NIAA can help build the capacity of communities to implement and sustain food security initiatives (AMSANT 2021, AMSANT 2022).

The Actions "Develop and implement a nationally consistent, price monitoring and comparison mechanism across all remote community stores" and "Price Watch will monitor the impact of investment intended to reduce prices, direct attention where needed, and provide pricing information to inform community decision-making" should be merged. However, we understand that the current powers to act on a store that is charging excessive prices (out of proportion to neighbouring stores) are limited. If this remains the case and because there is no effective competition in isolated remote communities, monitoring will likely lead to little action. If there can be legislative change to restrict excessive prices or if the community can be supported to take over a price-gouging private store, then this action would be worthwhile. It could also be useful if benchmarking information is fed back to stores comparing prices to similar stores ( same degree of remoteness ,or features such as requiring barge prices) so that boards could make decisions about whether their prices are reasonable or to high. If this actions goes ahead, it must be in in line with CTG principle four on data (feeding back to communities so they can take action).

AMSANT also highlights the importance of supporting community controlled enterprises that focus on local food production. These enterprises not only contribute to food security but also provide economic opportunities for communities. The harvesting of traditional foods, in particular, is an area that requires greater investment and support (AMSANT 2022).

Many communities are too small to have a conventional remote store. Laynhapuy Homeland's has developed an innovative model of very small stores that provide the essentials to homelands and may operate on much restricted hours. These models should be



encouraged with funding and other mechanisms. Such stores would not be able to meet codes of practice on key areas like storage and would need to be exempt from some requirements. Flexible funding should be provided to innovative models for increasing access to stores

# **Proposed Intended Outcomes**

- Develop national standards for remote stores, including benchmarking and needs based support to build capacity, and support implementation in each jurisdiction to improve food security.
- Support adequate remote store infrastructure, storage, power, and disaster resilience to ensure continuous supplies of food and other essentials in remote communities.
- Support remote stores to remain viable and provide affordable, healthy food whilst retaining and promoting community participation and control (CtG Outcome 17).
- Provide tailored, accessible support for community-led First Nations store governance, management and staff capability (local workforce).

#### **Potential Actions**

- In partnership with remote stores and First Nations health organisations, co-design and implement a national Industry Code for remote stores, including benchmarking against other stores and a support package where required to meet required standards.
  - The Code will detail both minimum food security standards and best practice to meet remote community food security needs. Periodic assessment of performance will be benchmarked against other stores and reported back to store owners, managers, and Boards.
  - The Code will be supported by a suite of capacity building measures designed to encourage continuous quality improvement, including support for health instore environments that promote healthy food purchases.
- Invest in the capability of community stores to support healthy in-store environments, promote heathy food options, and increased availability and affordability of healthy foods.
- Support greater First Nations community involvement in the governance, management, and local staffing of remote community stores.
  - Provide assistance and incentives, where required, for First Nations store owners, managers and Boards to develop remote store policies that support food security outcomes, e.g., store employment, nutrition and pricing policies, financial management and governance practices.



- Work across Governments, inclusive of community engagement and input, to integrate food security as a key part of crisis preparedness planning frameworks and review options for effective short-term food relief during response and recovery.
- Develop a nationally consistent but flexible response for remote community stores to access essential support and provide food and other essential groceries during crisis, unplanned or extended supply chain interruption, and seasonal isolation.
- Provide access to support for financially unsustainable stores identified as an essential source of food and groceries, allowing for flexible community-led store management.
- Collect data and evidence about the availability, accessibility, and affordability of healthy home products in remote stores to establish a baseline measure and promote increased availability of whitegoods, cooking and cleaning products
- Expand remote resident access to food retailers through the establishment of transport assistance and food delivery services, particularly for remote communities without a local store.
- Develop and implement a nationally consistent, price monitoring and comparison mechanism across all remote community stores.
- Price Watch will monitor the impact of investment intended to reduce prices, direct attention where needed, and provide pricing information to inform community decision-making.

The last two actions should be merged.

# 07 Supply chains

# Recommendations

#### Governance

There is a remote food security working group that focuses on stores, supply chains and disaster management. However, it is an advisory group that meets infrequently We note that there is a separate sub-working group reporting to the committee oversighting strategy development, focused on supply chains, with a tender currently out to assess how to improve supply chains to remote communities. AMSANT has been concerned with the speed at which NIAA is making decisions and whether there is shared decision making in this area. Transparency is essential for true partnership with the community controlled sector, and the successful implementation of this Strategy. For example, food distribution centre locations need to be decided with communities. We recommend engaging as soon as possible with



community controlled organisations or community representatives that have expertise in this space.

Freight costs are a major factor affecting healthy food prices in the NT. Cost of freight is discussed in the AMSANT 2021 Food Summit Report:

"For Aboriginal community members, Stores in both remote and urban settings, and community controlled agriculture ventures, infrastructure was the number one barrier to improved affordability, sustainability and growth. Higher freight cost to remote communities due to poor road conditions and barge landings mean higher costs for all involved in the NT food system. The need for stores to access specialist trucking and barge companies to freight stock out to community stores and the impact and cost these roads have on community members' ability to travel into towns to access alternative food sources is significant."

Freight costs vary widely across communities. How to allocate a freight subsidy fairly and ensure that it does result in lower prices for remote residents rather than greater profits for freight companies needs expert review. A fairly applied freight subsidy could assist to even out costs across remote communities caused by the degree of remoteness, wet season road closures and expensive transport such as barges

We note that non community controlled organisations such as Foodbank receive freight subsidies while community controlled store organisations such as ALPA do not. Freight cost has been cited several times as a major barrier to food security (e.g. during AMSANT member meetings, the 2021 AMSANT Food Summit, and the Hub consultation held in Darwin for this Strategy). While this may have happened inadvertently, at worst this is an example of structural racism. Freight subsidies should be organised for community controlled stores as a high priority.

# **Upgrading Infrastructure in Remote Areas**

Upgrading infrastructure in remote areas (barge landings, roads etc) is expensive and will benefit remote communities across multiple areas whilst also potentially benefiting industries such as mining as well. Therefore, although we recognise this as critically important, it should not be allocated as part of a food security budget as this will limit what can be spent on areas more specifically related to food security

We agree with action to reduce food costs by working with wholesalers etc. This could particularly benefit independent community-controlled stores or private stores who could be supported to form a buying group with the economy of scales that this brings

# **Proposed Intended Outcomes**



- Remote supply chains are effective, affordable, and flexible, including improved
  partnerships with remote First Nations people and resilience to disruption. Strengthen
  all-weather access infrastructure, reduce connection points, and shorten transport
  distances.
- Improve remote bulk purchasing, storage capabilities and timely distribution of food
- Emergency and Disaster Risk Management policies are designed in partnership with First Nations people and effective at ensuring remote supply chains are resilient against disruption due to extreme weather or other disaster events, such as pandemic.

#### **Potential Actions**

- Provide remote communities with findings of the '2023-2024 supply chain study'
  - Work with First Nations people, communities, and other sector specialists to implement actions to improve resilience and deliver sustainable price reductions on healthy essential items in remote community stores.
- Develop a long-term cross-government investment plan to upgrade road, air, and sea transport infrastructure that support food security in remote First Nations communities.
  - Include consideration of food storage and distribution centres closer to remote communities to increase access to bulk pricing, protect against supply interruption, and provide a facility for local producers to distribute to local communities.
- Assist remote community stores to collaborate and develop partnerships with local food producers, wholesalers, and other remote community stores to lower the cost and improve the quality and variety of food in stores.
  - Encourage food and grocery manufacturers, wholesalers, distributors, and producers to provide lower prices to remote stores on core items agreed with remote First Nations communities.
  - o Identify opportunities to increase remote retailer access to a greater number of wholesalers to improve resilience, increase range and foster competition.
  - Facilitate and provide assistance to increase cooperative purchasing amongst remote stores to reduce prices and improve the quality and range.
  - Assistance to improve and monitor food handling and temperature control in the transportation of foods.

# 08 Policies, Practice and Governance

#### **Theme 1: Governance and Leadership**

The NIAA's proposal to establish a National Remote Food Security Governance Body /Committee is a significant step forward in ensuring that food security initiatives are guided

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by cohesive and inclusive governance structures that align with Close the Gap principles. It is critical that this governance body should be a decision making body rather than having an advisory function. Furthermore, there should be at least equal representation between community controlled representatives and government. Community controlled representatives should include health organisations but also ALPA and other community controlled organisations working in the food area. At present, there is an overarching reference group developing the strategy and a second working group containing food retailers/wholesalers as well as AMSANT and NACCHO. One inclusive governance group with subgroups as needed would allow for better communication and collaboration.

The governance body should not only serve as a central coordinating entity but also empower local communities by ensuring that their voices are heard, and their needs are prioritised in decision-making processes. Furthermore, the community controlled sector (health and others such as ALPA) need to be resourced to participate as equal partners in the process. An example is the Northern Territory Aboriginal Health Forum where AMSANT is funded to convene and manage NTAHF business. The Chair and secretariat being based in the community controlled sector, and appropriate resourcing for policy capacity across both the health and store sector will assist in making this an Aboriginal led governance process

Jurisdictional governance is also critical given that State and Territory governments have key roles related to food security. It may be that food security could be discussed in existing jurisdictional structures or a specific jurisdictional forum may be needed- this decision should be made in partnership with community controlled decision making structures in each jurisdiction.

AMSANT has advocated for greater community involvement in the governance of food security programs. This includes requiring all remote community stores to have an operating community board or advisory committee. Such governance structures are essential for ensuring that food security initiatives are culturally appropriate and aligned with community priorities (AMSANT 2021, Coalition for Healthy Remote Stores 2024). However, food security is broader than stores. Community based or regional food /nutrition action groups could be supported to develop regional plans across the focus areas particularly those relating to country, health promotion and healthy economies. Local or regional community groups could also provide vital feedback on how the strategy is being implemented. Grass roots honest feedback is critical to the evaluation of this strategy – it is where the "rubber hits the road". The Galawinku Nutrition Action Group is an example of such a group. The group is currently supported with research funding which is likely to stop within a few years. The strategy could provide funding for regional groups that have some focus on food security (they may have a broader purpose) to support them. Another alternative is for additional funding to be provided to store boards to work more broadly across food security.



# **Theme 2: Data Collection and Continuous Improvement**

Accurate and comprehensive data collection is crucial for informed decision-making and the continuous improvement of food security initiatives. AMSANT supports NIAA's proposal for a comprehensive review of statistical collections related to food insecurity in remote communities. This review should be coupled with continuous improvement mechanisms, such as the use of the NT Market Basket Survey, to ensure that data is actionable and leads to tangible improvements in food security (Coalition for Healthy Remote Stores 2024). However, NIAA or other Federal governments should not make unilateral decisions (as largely occurs now) about data collection and evaluation – these decisions must be taken to the overarching governance body. Data collection must be coupled with a commitment to feed this data back to communities and organisations (including store boards) in a way that empowers them to make decisions- this is happening poorly at present.

AMSANT also emphasises the need for an Aboriginal led streamlined and transparent monitoring and evaluation system that is developed by the Strategy governance body that can draw on external expertise as needed. As noted before, community controlled partners must be resourced to participate. Such a system should include annual benchmarking and public deidentified and aggregated reporting to promote transparency, accountability, and continuous improvement (AMSANT 2022, Coalition for Healthy Remote Stores 2024). Again, though this information also needs to be fed back to local communities in a way that suits them – this is not through a dense report.

#### Theme 3: Crisis Preparedness and Response

Remote communities are particularly vulnerable to crises such as natural disasters, which can severely disrupt food supply chains. AMSANT supports the establishment of a responsive funding model that would cover additional costs incurred by remote community stores during emergencies. This model should ensure that stores can maintain adequate food supplies during crises, thereby safeguarding food security for remote communities (Coalition for Healthy Remote Stores 2024). Importantly, as already noted, disaster responses tend to be top down with little community input and Federal government funding is usually allocated to communities on the advice of the States and Territories, with little / no opportunity for community input. This needs to change as well with a shared decision making framework which includes Aboriginal leadership.

# **Theme 5: Policy Development and Implementation**

AMSANT advocates for the development of a National Industry Code for all food retail outlets in remote communities, including takeaways and roadhouses. Research has highlighted that takeaways are eaten very frequently in remote communities – a ethnographic study found that poor infrastructure for cooking and storing food and food insecurity in extended family causing groceries to be eaten within a day of purchase (even if they were



designed to last much longer) meant that takeaways were much more practical than buying food to cook for many people (Bryce et al 2020). This code should be co-designed with communities and community controlled organisations such as ALPA, and should establish best practices for promoting healthy food environments. Additionally, policies that support the inclusion of community governance in store management should be mandated to ensure that food retail outlets operate in a manner that aligns with community priorities (Coalition for Healthy Remote Stores 2024).

#### Recommendations

# 1. Establish and Empower a National Remote Food Security Governance Body:

Ensure that this body is Aboriginal led, with representation from Aboriginal organisations and communities at equal or higher number than government representatives, and has the authority to oversee the development, implementation, and evaluation of food security initiatives across remote areas.

# 2. Implement a Comprehensive Data Collection and Continuous Improvement Framework:

Develop an Aboriginal led monitoring and evaluation system that includes annual benchmarking, reporting back to communities and regions as well as public reporting, and continuous improvement mechanisms to ensure that food security initiatives are effective and responsive to community needs.

# 3. Establish a Responsive Funding Model for Crisis Preparedness and Response:

Create a funding model that supports remote community stores in maintaining food supplies during emergencies, ensuring that communities are not left without access to essential food and grocery items during crises. Ensure the community controlled sector is included in decisions about allocation of this funding.

#### 4. Develop and Implement a National Industry Code for Food Retail Outlets:

Co-design a National Industry Code with communities/community controlled organisations to establish best practices for promoting healthy food environments in all food retail outlets, including takeaways and roadhouses, in remote areas.

#### **Proposed Intended Outcomes**

- Ensure reliable and accessible remote First Nations food security data is in line with CtG Priority Reform 4, Outcome 17
- Food Security Strategy governance, monitoring and evaluation linked to CtG Priority Reforms and Targets



- First Nations governance systems and leadership are included across the food security system in line with CtG Priority Reforms 1 and 2
- Ensure the Strategy connects with and informs related government policies and programs, without duplication.

#### **Potential Actions**

- Reform Government processes to ensure policies and programs related to remote food security are developed and co-designed with First Nations people, which isn't currently the case.
- Resourcing to establish ACCHS or Land Council led Regional Food Security
  Working Groups and community-based Food Security Workforces to ensure that
  Closing the Gap Priority Reforms and Targets are being met.
- Embed achievement against the Closing the Gap Priority Reforms in the Terms of Reference for the Remote Food Security Working Group and/or other remote food security-related Industry partnerships
- Conduct a comprehensive review of the statistical collections used by Commonwealth and State and Territory Governments to measure remote food insecurity in remote communities.
  - o Identify areas for improvement and \ensure data is provided in a way that meets the Closing the Gap obligations.
- In partnership with Community Controlled organisations, develop a framework to support monitoring, evaluation, learning and revision throughout implementation of the Strategy in line with CtG Priority Reforms, including aligning with community perspectives in defining measures of success and incorporating risk-based approaches.
- Support First Nations food security data collected, stored, and reported in line with Closing the Gap Priority Reform 4 and undertaken by First Nations Community Controlled Organisations in line with Priority Reform 2, where viable to do so

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