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Planetary Health Equity at the heart of food security

Planetary Health Equity Hothouse at The
Australian National University submission to
the National Food Security Strategy:
discussion paper

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About the Planetary Health Equity Hothouse

Humanity faces three major and interconnected challenges to planetary health equity (PHE) – climate change, social inequality and premature death and disease. The PHE crisis acknowledges the need to transform the consumptogenic system of institutions, actors, policies, commercial activities, and norms that incentivises and rewards the excessive production and consumption of fossil fuel-reliant goods and services that are unhealthy and inequitably valued and distributed.

Equipped with a better understanding of the consumptogenic system, the Planetary Health Equity Hothouse (the Hothouse), housed within the School of Regulation and Global Governance at the Australian National University, generates new ways to address these challenges, is identifying the conditions that enable the transformation of the system towards planetary health equity goals, and working to shift governance practices toward a more effective modern paradigm.

We do this by producing evidence that promotes PHE - the equitable enjoyment of good health for all within a stable Earth system. We also do this by building the capacity of researchers, young professionals and future leaders to develop impact driven research that can be used to inform policy formulation and decision making.

Acknowledgements

The Planetary Health Equity Hothouse acknowledge and celebrate the First Australians on whose traditional lands this submission was written, and pay our respect to the Elders past and present.

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Introduction

The Planetary Health Equity Hothouse welcomes the opportunity to contribute a submission to the Department of Agriculture, Fisheries and Forestry's 'National Food Security Strategy: discussion paper'. The development of a National Food Security Strategy (Strategy) is as an important step towards achieving Planetary Health Equity (PHE) - [the equitable enjoyment of good health in a stable Earth system](#).

While Australia produces enough food for [80 million people](#), [one in eight](#) Australian households remain food insecure. Long-term, equitable solutions to the problem of food insecurity require addressing the intersections of health, equity, labour rights, agriculture, manufacturing and transport, the economy, retail and consumption. It also requires addressing the complexity of [climate change and increasing exposure](#) to extreme weather events that undermine equitable access to healthy foods.

With the recent release of Australia's first National Climate Risk Assessment, it is a crucial and timely opportunity for Australia to show leadership and ensure that the Strategy takes into consideration the environmental, social and health implications of the food system.

A successful Strategy will be one that:

- Provides the opportunity to meet food security needs, while simultaneously meeting health, environmental, social and economic objectives.
- Considers the whole of the food system and all [six pillars of food security](#) to ensure all people have both adequate food (quantity) and nutrition (quality). The scope of the Strategy must be broader than production, availability and caloric intake alone.
- Genuinely incorporates a cross-departmental, cross-governmental approach with diverse expertise from community organisations, academia, small business.
- Sets out a framework for participatory governance not only at the Federal level, but also in ways that connect with state and territory, and local governments.
- Allocates sufficient, long-term funding for implementation and evaluation of the Strategy.
- Identifies key measures of success for food security and conducts regular measurement and public reporting.

To aid in the Department's successful development of the Strategy, we have made a series of comments and recommendations under each of the 'questions for discussion'. We have also developed additional comments and recommendations to enhance the Strategy, with PHE in mind. We look forward to working with Department on this important work.

Questions for discussion

1) What other principles should government, industry and community prioritise to support the development of the strategy and why are these important?

The proposed guiding principles - whole of food system, collaborative, ambitious and forward looking, outcomes-based and practical – are sensible approaches to policy governance.

Given the complexity of food systems, we recommend a series of more specific, food systems related principles to also be included.

Recommendation 1: Health, environmental sustainability, equity and wellbeing. These principles sit at the heart of food systems and must be core to the Strategy if Australia's food system is to substantially improve food security.

Recommendation 2: Food as a human right. In 1976, the Australian Government recognised food as a human right by signing the [International Covenant on Economic, Social and Cultural Rights](#). This commitment under international law should be reflected in the principles and framing of the Strategy.

Recommendation 3: Evidence-informed. The principle of fit-for-purpose evidence-informed approaches to food systems changes is crucial to developing policy settings based on rigorous understandings of the environmental, social and health co-benefits.

2) What timeframe should the strategy work towards – short (1 to 2 years), medium (5 to 10 years) or long (10-plus years) term, and why?

We support the Strategy working towards a long-term timeframe to achieve maximum impact on food security. Additionally, we support the inclusion of short-, medium- and long-term goals and review cycles within the Strategy.

Recommendation 1: Short-term goals should reflect the 'quick wins' that can be achieved through Commonwealth Government support and investment, and embedded within a broader, long-term strategy.

Recommendation 2: Medium-term goals should reflect the time needed to build trusting relationships with actor groups who will be integral to the development, implementation and monitoring of the Strategy, and to understanding the cross-system effects of specific actions.

Recommendation 3: Long-term goals should reflect an intergenerational approach to policy impact, recognising impact translation through food systems may take several years to reveal itself.

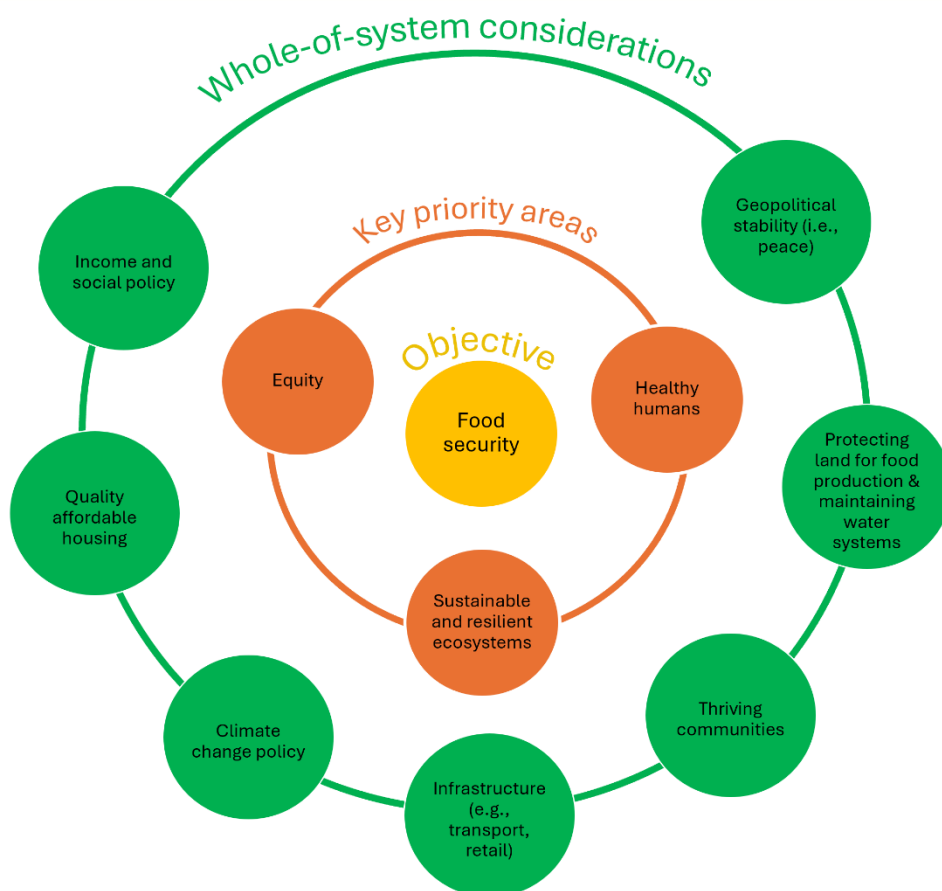
Recommendation 4: Funding allocations for the Strategy's ongoing implementation, monitoring and evaluation must be commensurate to the complexity of changes needed and safeguarded in future budgetary processes.

3) Are there examples of current or planned initiatives by you or your organisation to improve food security in your sector?

We recognise the importance and impact of diverse community-led initiatives and organisations that are taking place-based approaches to food security in Australia and encourage the Department to conduct direct consultation with these groups.

4) Do the proposed key priority areas and whole-of-system considerations adequately represent the actions needed for an effective food security strategy? If not, what is missing?

The proposed framework excludes several essential components of food security. As such, we propose a series of changes to Figure 2 in the discussion paper.



Proposed framework for food security in Australia, conceptualised by Dr Amy Carrad

Recommendation 1: The three priority areas for the food system should be equity, human health, and sustainable and resilient ecosystems. The currently proposed priority areas suggest the purpose of food security is related to commercial interests. We propose a planetary health equity framing to better reflect the role of food in the lives of all people, and not only commercial actors and interests.

Recommendation 2: We recommend that whole-of-system considerations in the Strategy integrate structural drivers of food insecurity that sit outside the food system including climate change policy, income and social policy, land planning that ensures the protection of land and water systems, infrastructure, and access to quality affordable housing.

5) What actions could the strategy take to address challenges under each key priority area?

As outlined in our response to Question 4, we recommend an amendment to the proposed key priority areas of the discussion paper that prioritises planetary health equity goals, rather than commercial interests.

For each of the currently proposed priority areas below, we make the following additional comments and recommendations.

Resilient supply chains

Recommendation 1: Support localised solutions that build regional food resilience and diverse business models – for example: community supported agriculture, cooperatives, social enterprises - without relying on globalised, just-in-time supply chains. Strengthening localised supply chains and reducing reliance on imported inputs will be increasingly important as Australia is exposed to more frequent and more extreme weather events linked to climate change.

Productivity, innovation and economic growth

Recommendation 1: Remove consumptogenic norms associated with food systems. While the food system undoubtedly is a contributor to prosperity in Australia, as outlined in the discussion paper, the commodification of the food system has led to a food system that is detrimental to planetary health equity, which ultimately undermines productivity. Any proposals to increase agricultural productivity and growth should outline how they will:

- a) result in production of a broad range of healthy, minimally-processed foods;
- b) create supply chains that will link these foods to people in equitable ways;
- c) identify the likely impacts of increasing productivity on the environment (and appropriate safeguards); and
- d) create distributed benefits across the sector (including to small holders, small-to-medium businesses, social enterprises and community organisations).

Competition and cost of living

Recommendation 1: Address the drivers of economic inequity throughout the whole-of-government. Australia is experiencing an economic inequality crisis, not a cost-of-living crisis. It is not beyond Australia's capacity to eradicate poverty and provide all Australians with sufficient financial means to acquire adequate, nutritious food. Policy interventions during the height of the COVID-19 pandemic - for example, increasing social security payments - demonstrated that these interventions are possible. They pulled people out of poverty, with the [corresponding impact](#) of people having money to buy healthy food.

Recommendation 2: Implement regulatory interventions that constrain the market concentration of corporations across the food supply chain from agricultural inputs through to retail, including large corporate retailers such as Coles and Woolworths.

Recommendation 3: Ensure planning frameworks facilitate diversified food retail environments – for example, independent food outlets - that provide relatively more affordable healthy and environmentally sustainable options.

6) What actions could the strategy take to address challenges under these whole-of-system considerations?

See our responses to Question 4 above. For each of the currently proposed whole-of-system considerations below, we make the following additional comments and recommendations.

Climate change and sustainability

Recommendation 1: The proposed scope for 'sustainability' is narrow. We recommend the scope is broadened to include biodiversity, land use, water systems, nutrient cycles, and chemical pollution.

Recommendation 2: Mandate climate and environmental risk assessments and actions across the food sector.

Recommendation 3: Support, through adequate funding for research, infrastructure and labour, all farmers to make a transition to sustainable agricultural practices.

People

Recommendation 1: Support food sovereignty, including for Aboriginal and Torres Strait Islander peoples.

Recommendation 2: Ensure safe, secure and adequately paid employment for all food systems workers.

Recommendation 3: Address power imbalances in the governance of food supply chains that jeopardise farmers' livelihoods and people's own food security.

Health and nutrition

Recommendation 1: A key metric of success of the Strategy should be the number and equitable distribution of Australians who are fed well and sustainably. We recommend funding is made available to conduct three yearly monitoring of household food security using a rigorous nationally developed or adapted tool.

Recommendation 2: Curtail the negative effects of the ultra-processed food sector on food security by restricting marketing and taxing these companies and investing proceeds in actions that will bolster food security.

Trade and market access; National and regional security

Recommendation 1: Trade and investment policy should strengthen food systems that promotes planetary health equity in Australia and internationally. Trade and investment agreements offer the possibility of creating climate and conflict resilient supply chains by strengthening diverse food systems, including local systems that are better able to withstand and be resilient to shocks.

Further comments and recommendations

In addition to the comments and recommendations made to the questions for discussion, we propose a series of additional recommendations to further strengthen the discussion paper and subsequent strategy.

Recommendation 1: Embed the [development of baseline and regular monitoring of population level household food insecurity](#) to determine whether progress is being made. In addition to routine monitoring of household food security, introduce a suite of indicators to monitor food system ‘health’ and functioning (e.g., metrics accompanying [Scotland’s food policy](#)).

Recommendation 2: Include breastfeeding in the Strategy, acknowledging breastfeeding as “First Food Security” and a unique food system. Enabling breastfeeding requires investment in the [Australian National Breastfeeding Strategy](#) (e.g., Baby Friendly Health Initiative, infant feeding surveys). Protection of this system from commercial activities that promote breastmilk substitutes (i.e., infant formulas and toddler milks) is fundamental to food security. To this end, the Australian Government should legislate in full the [WHO International Code of Marketing of Breastmilk Substitutes](#) and subsequent World Health Assembly resolutions.

Recommendation 3: Structure the National Food Council with good governance obligations, measurable targets, independent oversight and transparency mechanisms. The National Food Council should include representation from Aboriginal and Torres Strait Islander peoples, community groups, social services, environment organisations, academia, people with lived experience of food insecurity, small-scale farmers and alternative business models like social enterprises.

Recommend 4: Develop strict guard rails against conflicts of interest in the National Food Council. There is extensive evidence that conflicts of interest in policy development distorts the ability to make meaningful changes in food systems. The safeguarding against conflicts should be a core principle of the Strategy and National Food Council to ensure its integrity and efficacy. Specifically, food-related corporations with significant financial and political power should not be on the Council.

Recommendation 5: Australia must ensure alignment with existing global frameworks such as the UN Sustainable Development Goals, and FAO food security agreements, and take inspiration from other countries that have developed holistic food policies (e.g., [Scotland](#), [Wales](#), [Canada](#), [Finland](#)).

Recommendation 7: We commend the Department's leadership in developing the Strategy but recommend that governance is ultimately facilitated by a Minister for Food located within the Department of Prime Minister and Cabinet to allow for policy coordination across the various departments whose decisions and actions influence food systems and food security.