



Legal & Social Issues Committee Inquiry into the impacts of food insecurity

Submission

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About Sustain: The Australian Food Network

Sustain is a health promotion charity and think-and-do network with a mission to create food systems that nourish people and nurture the planet. We know that transitioning to a healthier, more sustainable, and equitable food system requires good policy and practice, underpinned by a robust evidence base and inspiring examples that empower communities and governments to work collectively towards a better food future for all.

We believe in the understanding of the interconnectedness and mutual interdependence of all elements of food and agricultural systems and their interrelationship with other systems, including education, health, economy, culture and politics. We ground our work in a principled commitment to the human right to adequate, nutritious and culturally appropriate food.

As connectors, we facilitate events, networks, and communities of practice for sharing knowledge and fostering collaboration amongst diverse food system actors.

As policy experts, we understand the critical issues facing local government and their communities. Our integrated approach aims to cut across the institutional and departmental silos that hinder cohesive and integrated food policy implementation.

As researchers, we translate and share our food system knowledge to build an evidence base for effective food policy and action.

As practitioners, we design and deliver community food projects (including our two urban farms and a food hub) that experiment with innovative approaches to food system transformation and model the change we want to see. Our projects aim to demonstrate in the here and now that, *yes, a better future is within our grasp.*

Sustain is a certified social enterprise registered with Social Traders.

Promoting engagement with this Inquiry

As part of our commitment to capacity building and advocacy, we have undertaken actions to support other stakeholders to contribute to this important Inquiry.

Since 2021, Sustain has convened a **Local Government Food Systems Networking Forum** for Local Government staff as a **Community of Practice** to build capacity of staff working in food systems, as well as share ideas and challenges. These quarterly forums involve Council staff sharing their policy and practice updates, external speakers invited to speak on food systems topics and coordinating advocacy opportunities. Currently 20 Victorian Local Governments are part of this Community of Practice (CoP). Dr Sarah Mansfield MP recently presented to this CoP on how to make impactful policy submissions and we have facilitated several discussions on what local governments see as priorities as part of this Inquiry.

A common barrier to advocacy that we hear from our CoP and wider membership of community food organisations and individuals is a lack of resourcing and capacity to engage in these processes. To overcome this, Sustain developed a [Guidance note for this Inquiry](#) with relevant resources for stakeholders to draw on in making their own submissions.

In addition, we held two events to bring stakeholders together to generate momentum for this Inquiry.

1. Sustain and William Angliss Institute co-hosted a **Research Symposium, '[Shaping Victoria's Food Future](#)'** on April 6th at the Angliss Conference Centre, with 106 attendees. The event involved presentations from Dr Sarah Mansfield and food systems experts including Emeritus Professor Michael Buxton, Professor Kathryn Backholer and Dr Rebecca Lindberg on topics including peri-urban planning, commercial determinants of health, healthy food retail environments, household food insecurity and the right to food.
2. Sustain hosted a **webinar titled '[Food insecurity in Victoria - The role of the State Government](#)'** on July 8th with 141 registered participants, with presentations from the City of Greater Bendigo Give Where You Live Foundation, and the Just Food Collective. The purpose of the webinar was, first, to share with our members, supporters and the broader Victorian community some key statistics and research from Greater Bendigo and the G21 on the scale and nature of the issue of food poverty and food insecurity. Secondly, the types of locally driven and community-led solutions and responses; and thirdly, what policy, financing and other actions need to be taken by the Victorian government to address this growing social problem that is causing so much suffering throughout the state.

We confirm that we would welcome the opportunity to attend an oral hearing and give evidence to the Committee on the matters contained in this submission.



01 Recommendations

- **Governance**
- **Food Access**
- **Food pricing and affordability**
- **Food Supply, Production, and a Circular Food Economy**
- **How these recommendations could be funded**

Our recommendations cover actions for the State government both to address food insecurity and to strengthen Victoria's food system. These recommendations are grounded in human rights and specifically the human right to adequate food, enshrined in Article 11 of the International Covenant on Economic, Social and Culture Rights, which Australia ratified on 10 December 1975.¹

Governance

That the State government:

- **Creates an enabling policy environment** to transform Victoria's food system by **legislating the right to food in Victoria** and embedding this right into all relevant State and local government policies, budgeting processes and activities
- Commits to designing, implementing and evaluating a **Victorian Food Systems and Food Security Strategy and properly resourced Investment Plan**, integrating a rights-based and systems-based approach to meaningfully address food insecurity throughout Victoria. Specifically, that the State government:
 - Establishes a whole-of-government **Food Systems and Food Security Committee** with representation from First Nations and other food system stakeholders, to oversee the design, implementation, monitoring and evaluation of a Victorian Food Systems and Food Security Strategy and Investment Plan
 - Ensures that the design and implementation of the Strategy and the Investment Plan allow for meaningful engagement with a diverse range of stakeholders and community members, including those with lived experience of food insecurity and producers
- **Supports First Nations communities** with policies and resources to advance their goals and aspirations for their food sovereignty. This should begin with implementing the recommendations outlined in the [VACCHO Foodpath Report](#)
- **Empowers local governments** to lead the participatory development of community food systems and food security strategies via provision of financial and supporting resources. As such, food security should be reinstated as a priority area within the next Victorian Health and Wellbeing Plan, embedding food security within strategic health planning for all local governments in Victoria.
- **Resources a comprehensive food systems and monitoring framework**, including the use of best-practice survey instruments including the [USDA 18-item household food security survey](#) to measure the prevalence and severity of household food insecurity
- **Revises the Victorian planning provisions** (*Planning & Environment Act 1987*) to mandate health and food security as primary considerations when local governments and other planning authorities are making planning decisions

¹ <https://humanrights.gov.au/our-work/commission-general/chart-australian-treaty-ratifications-may-2012-human-rights-your>

- **Re-establishes and resources the [Victorian Food Relief Taskforce](#) with an expanded membership** to include First Nations, persons with lived experience of food insecurity and front-line agencies
- **Recognises that emergency food relief is not a solution to food insecurity**

We also refer the Committee to the responses to the Questions on Notice that we submitted to the Environment and Planning Committee's Inquiry on Securing Victoria's Food Supply. These responses provide considerable detail and depth regarding the scope of the proposed statewide Food Systems and Food Security Strategy, the types of initiatives that it should include and the role of local government in supporting sustainable food systems and food security (see Appendix A).

Food Access

That the State government:

- Advocates to the Federal Government to **increase income support payments**, including Jobseeker, to above the poverty line and indexed to wage growth, consistent with a rights-based and income-first approach to food security
- **Legislates food as a human right** and works towards its progressive realisation, ensuring that all Victorians, especially the people who experience the biggest barriers to food security, have equitable access to healthy, sustainable, and culturally appropriate food always
- **Continues to resource the Foodbank [school breakfast club program](#)**, with a medium to long-term outlook to create a state-based initiative that provides all Victorian public schoolchildren with a healthy, locally procured breakfast to ensure that they are nourished and able to reach their full potential
- Develops, implements and coordinates **public sector food procurement programs** to support local, regenerative and agro-ecologically managed farms
- **Comprehensively resources the emergency food relief sector** during the transition to a new food system paradigm based on dignified access to good food for all
- Collaborates with the education sector to **develop comprehensive and practical food literacy programs**
- Collaborates with service recipients to **create dignified models of food relief**
- Implements a **supplemental nutrition program for pregnant women, infants and young children** to ensure food and supplements are available in the vital period of early childhood, like the Women Infant and Children program (USA) and Healthy Start (UK), in collaboration with Maternal and Child Health Services

Food Pricing and Affordability

That the State government:

- Supports the recommendations of the report of the Federal Senate Select Committee following its recent [Inquiry into Supermarket Prices](#) (May 2024), including:
 - **Recommendation 1:** amend the Competition and Consumer Act 2010 ‘to create divestiture powers specific to the supermarket sector, where a supermarket has been founded to have misused their market power under s.46 of the Act’
 - **Recommendation 2:** amend s.46 of the Competition and Consumer Act 2010 ‘to prohibit the charging of excess prices (otherwise known as price gouging)’
 - **Recommendation 3:** ‘establish a Commission on Prices and Competition to examine prices and price setting practices of industries across the economy’, including monitoring and investigating supermarket prices and price setting practices
 - **Recommendation 5:** that ‘the Treasury take immediate steps to make the Food and Grocery Code of Conduct mandatory, with an appropriate regime of financial and other penalties for breaches’
 - **Recommendation 7:** that ‘the Australian Government implement merger reforms as proposed by the Australian Competition and Consumer Commission (ACCC)’
 - **Recommendation 8:** That the ACCC be given ‘powers to investigate and make recommendations to government to address land banking in the supermarket sector’
 - **Recommendation 9:** That ‘the Australian Government amend the Unit Pricing Code [so] that supermarkets are required to adopt a mandatory information standard for unit pricing [and] standardise and rationalise discount and promotional terms’
- Supports the passage of the *Supermarket Industry Bill (2024)* which will bring supermarkets under the coverage of the Essential Services Commission Act 2001 as a regulated industry
- Enables the **Essential Services Commission** to monitor and report on the retail sale prices offered by supermarkets for essential grocery items, in particular fresh fruit and vegetables
- Enables the Essential Services Commission to investigate and report on profit margins for supermarkets in relation to essential grocery items
- Enables the Essential Services Commission to designate a prescribed price for an essential grocery item offered for sale by a supermarket in Victoria

Food Supply, Production, and a Circular Food Economy

That the State government:

- Facilitates a pragmatic and well-planned **transition to forms of food production** that will nourish generations to come, such as regenerative agriculture / agroecology. This should involve a commitment to **strengthen local and regional food production** to mitigate and reduce reliance on imported food products and thereby enhance the resilience of Victoria's food system and its capacity to deal with anticipated and unanticipated shocks and crises
- Works with local governments, food producers and community organisations to **decentralise and diversify food production, storage, and retail**, for example via the expansion of local markets, urban agriculture (including community gardens as well as small-scale peri-urban farms and market gardens), supporting increased biodiversity of crops, agroforestry, and livestock and regional food hubs.
- Works with local governments, food producers and community organisations to **strengthen Victoria's circular food economy**, building on the substantial work already underway led by Sustainability Victoria and its many partners

How These Recommendations Can be Funded

Spending money on implementing the above recommendations and creating an equitable, affordable, and sustainable food system needs to be recognised as a necessary and overdue investment in preventative public health as well as a serious commitment to the realisation of the human right to good food for all Victorians.

As such, we propose several funding mechanisms that should be explored by the State Government to establish a **Food Systems and Food Security Fund**. These include:

1. **Extension of the existing Payroll Tax Surcharge** and
2. **Targeted land tax specifically for land owned and purchased by the major supermarket chains (MSC) and the major fast-food chains**, acknowledging the negative externalities that these commercial actors in the form of non-communicable disease and ecological degradation.

Details regarding these funding mechanisms, which could potentially raise hundreds of millions of dollars for a Victorian Food Systems and Food Security Fund, are set out in Section 5.



02 Impacts of food insecurity in Victoria

Food insecurity in Victoria

The 2022 Victorian Population Health Survey (the most recent available data) estimates that 8.1% of Victorians experienced **severe food insecurity**, with low-income households disproportionately impacted. For households earning <\$40,000 and between \$40,000-60,000, the prevalence of food security was found to be 23% and 13% respectively. However, acknowledging that food security exists on a spectrum ranging from marginal to severe, the true burden of food insecurity is likely underestimated in these figures. Since this data was collected, Victorians have experienced a worsening cost of living crisis that is further constraining household food budgets. This underscores the importance of timely data collection and reporting of the level and extent of food insecurity across Victorian households and communities. Data should be statistically representative at a Local Government level to develop a more comprehensive understanding of food insecurity and its distribution to support local decision-making.

The 2022 *Taking the Pulse of the Nation* survey estimates that 1 in 5 of all Victorian adults experienced some level of food insecurity in late 2022, with 8.8% both skipping meals and eating less in the last three months due to financial constraints. However, in the 18-44 age group, more than one in four are estimated to be food insecure: 3.7% have skipped at least one meal in the past 3 months, 8.7% are eating less, while 14.3% have both skipped meals and are eating less. The situation becomes even more stark amongst the youngest demographic – 18-24-year-olds, of whom 45% are reportedly food insecure (Figure 1).

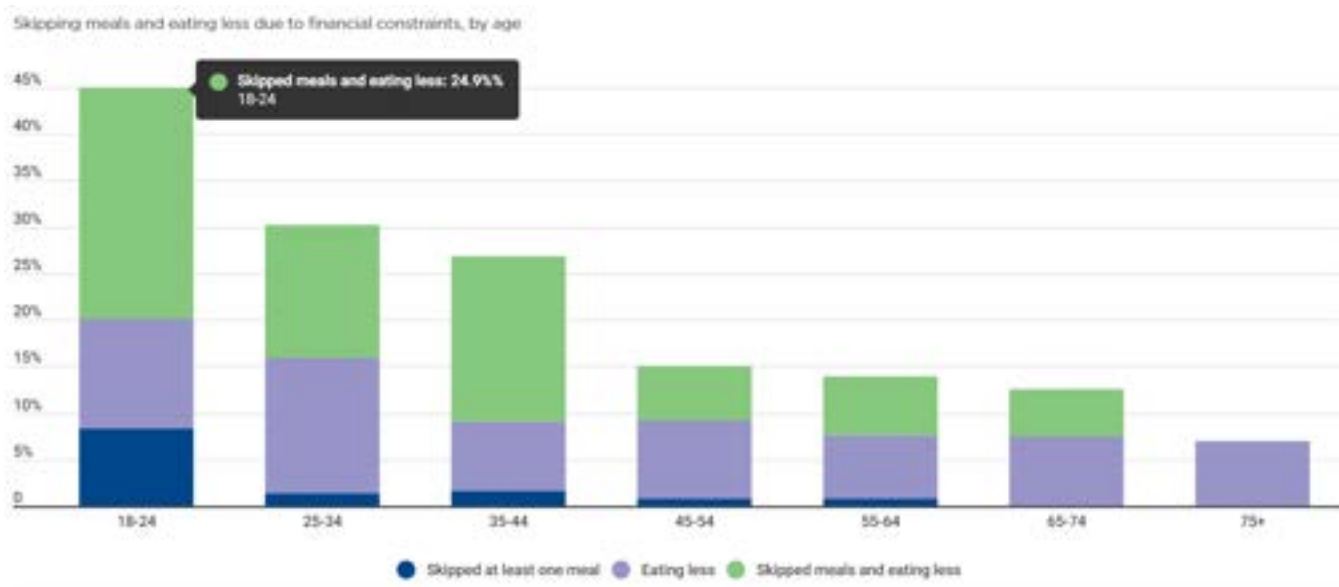


Figure 1: *Taking the Pulse of the Nation* (2022)

These estimations of high levels of food insecurity are echoed by the Foodbank Hunger Report (2023), finding that 36% of Australians are food insecure, with 23% severely so (Figure 2).



Figure 2: Foodbank Hunger Report (2023), Foodbank Australia.

Moreover, the Foodbank report demonstrates that food insecurity is inequitable, with single parents, those experiencing insecure housing, those with a disability, young people, and those currently unemployed all facing very high levels of severe food insecurity (figure 3 below).

Further, First Peoples are four times more likely to be food insecure compared to non-indigenous in Victoria (Marcwick et al. 2014).

Culturally diverse communities are also at high risk of food insecurity, particularly asylum seekers. A study of Asylum Seeker Resource Centre (ASRC) clients revealed that almost all had experienced food insecurity, a direct result of government policies that excluded them from economic participation or access to government benefits (McKay and Dunn 2015).

As will be discussed in more depth in the following section, food insecurity is caused by many structural failings that have resulted in high living expenses, an inadequate social security net for the most vulnerable, and the contemporary housing crisis.



Source: Foodbank (2023). 2023 Foodbank Hunger Report. <https://reports.foodbank.org.au/foodbank-hunger-report-2023/>

Figure 3: Demographics experiencing severe food insecurity, Foodbank Australia

Impacts of food insecurity

Food insecurity as structural violence

Research has consistently shown that food insecurity is associated with poverty or financial stress, disadvantage, social and economic exclusion and/or insufficient social and economic support systems. For this reason, some scholars now describe food insecurity as a form of *structural violence*.

Structural violence refers to the social structures – economic, legal, political, religious and cultural – that prevent individuals, groups and societies from reaching their full potential. (Macassa et al 2021)

Structural violence impedes the capacity of individuals or social groups to reach their potential wellbeing and enjoyment of life. It includes policy narratives that frame inequity as a function of individual circumstances rather than systemic injustice or policy failures. Structural violence can also be understood as policies or programs that normalise the redistribution of surplus, unsaleable or inferior food to vulnerable people (Hodgetts et al 2014). This is the case in Victoria, where “emergency food relief” is still the dominant “solution” to food poverty promoted by most actors and stakeholders, rather than addressing the socio-economic causes of food poverty and food insecurity through stronger social policy grounded in commitments to basic human rights and dignity.

Food insecurity is a structural issue. It is experienced when governments are either unwilling or unable to assure basic human rights, including food, for their citizens. The human right to adequate food is part of the basic right to a decent standard of living, which can be found in numerous international human rights instruments that have been ratified by Australia:

- [International Covenant on Economic, Social and Cultural Rights \(ICESCR\)](#)
- [Convention on the Elimination of All Forms of Racial Discrimination \(CERD\)](#)
- [Convention on the Elimination of All Forms of Discrimination Against Women \(CEDAW\)](#)
- [Convention on the Rights of the Child \(CRC\)](#)
- [Convention on the Rights of Persons with Disabilities \(CRPD\)](#)

Further, the United Nations Committee on Economic, Social, and Cultural Rights explicitly states (in General Comment 12)²:

[T]he right to adequate food is indivisibly linked to the inherent dignity of the human person and is indispensable for the fulfilment of other human rights enshrined in the International Bill of Human Rights. It is also inseparable from social justice, requiring the adoption of appropriate

² See <https://documents.un.org/doc/undoc/gen/g99/420/12/pdf/g9942012.pdf>

economic, environmental and social policies, at both the national and international levels, oriented to the eradication of poverty and the fulfilment of human rights for all.

The right to adequate food...imposes three types or levels of obligations on States parties: the obligation to respect, to protect and to fulfil:

- *To **respect** existing access to adequate food requires States parties not to take any measures that result in preventing such access*
- *To **protect** requires measures by the State to ensure that enterprises or individuals do not deprive individuals of their access to adequate food*
- *To **fulfil (facilitate)** means the State must pro-actively engage in activities intended to strengthen people's access to and utilization of resources, and means to ensure their livelihood, including food security*
- *To **fulfil (provide)** means the State must provide the right directly when an individual or group is unable, for reasons beyond their control, to enjoy the right to adequate food by the means at their disposal. This also applies to victims of natural or other disasters.*

By failing to fulfil (facilitate) the right to food through *inter alia* inadequate welfare provision combined with prohibitively expensive housing, thereby forcing hundreds of thousands of Victorians into a state of moderate or severe food insecurity, both the Federal and Victorian governments are exposing citizens to structural violence and harm in several ways, as we discuss below.

Many of the impacts of food insecurity discussed in the rest of this section are also its causes, that is they act in a reciprocal nature. Food insecurity can intensify experiences and levels of mental illness, physical illness, cultural disconnection, isolation, and insecure housing. Simultaneously, these are risk factors for food insecurity, and experiencing them decreases people's ability to access food in numerous ways.

Food insecurity and mental health

Numerous global and Australian studies have demonstrated that food insecurity is a risk factor for depression, anxiety, stress, and many other mental illnesses^{3,4,5}. They are also circularly linked: as people become more food insecure, their mental health decreases, in turn making it

³ Cain, K.S. et al. (2022) 'Association of Food Insecurity with Mental Health Outcomes in Parents and Children', *Academic Pediatrics*, 22(7), pp. 1105–1114.

⁴ Jones, A.D. (2017) 'Food Insecurity and Mental Health Status: A Global Analysis of 149 Countries', *American Journal of Preventive Medicine*, 53(2), pp. 264–273.

⁵ Pourmotabbed, A. et al. (2020) 'Food insecurity and mental health: a systematic review and meta-analysis', *Public Health Nutrition*. 2020/03/16 edn, 23(10), pp. 1778–1790. Available at: <https://doi.org/10.1017/S136898001900435X>.

harder to access food^{6,7}. This could be due to losing financial income due to mental illness and consequently being unable to afford food, or they may find it difficult to be in public spaces due to anxiety, again limiting their ability to access food.

Demonstrating these links, a 2022 survey of suicide prevention services in Australia found that 88% reported an increase in service use over the last 12 months, an increase from 78% in 2020 and 85% in 2021.⁸ In addition to food insecurity being a risk factor for stress and possible suicidal ideation, causes for both are similar – financial stress, housing insecurity, unemployment, and isolation from the community^{9,10,11}. Like many food relief agencies, these services also note that the demographics of the people they support have changed, with cost-of-living increases and personal debt a leading circumstance in elevating distress.

Moreover, between August 2022 to January 2023, Lifeline saw a 49% increase in referral searches by helpline counsellors specifically relating to financial issues and homelessness, along with a significant increase in demand for food distribution at their face-to-face crisis support centres¹².

⁶ Myers, C.A. (2020) 'Food Insecurity and Psychological Distress: a Review of the Recent Literature', *Current Nutrition Reports*, 9(2), pp. 107–118.

⁷ Cho, J. (2023) 'The longitudinal reciprocal relationship between food insecurity and depressive symptoms among Korean elderly who live in poverty: application of auto-regressive cross-lagged model', *Asia Pacific Journal of Social Work and Development*, 33(2), pp. 86–100.

⁸ Suicide Prevention Australia (September 2022). [State of the Nation in Suicide Prevention: A Survey of the Suicide Prevention Sector](#)

⁹ Australian Institute of Health and Wellbeing (2022). *Social and Economic Factors associated with Suicide in Australia: A Focus on Individual Income*

¹⁰ Stack, S. (2021) *Contributing factors to suicide: Political, social, cultural and economic*. *Suicide Prevention*, 152, p. 106498.

¹¹ Graham, C. and Ciciurkaite, G. (2023) 'The Risk for Food Insecurity and Suicide Ideation among Young Adults in the United States: The Mediating Roles of Perceived Stress and Social Isolation', *Society and Mental Health*, 13(1), pp. 61–78.

¹² Lifeline (2023). [Cost-of-living pressures trigger record demand for Lifeline's resources](#)

In economic terms, the Productivity Commission estimates that poor mental health and suicide cost around \$200 to \$220 billion per year including direct economic costs of around \$40 to \$70 billion. This highlights the importance of greater investment in education, employment, social services, housing and justice as crucial to improved mental health (Productivity Commission 2020)⁶.

While this is currently a major issue, it also presents an opportunity to greatly improve the wellbeing of all Victorians, as well as reduce the direct, and indirect costs associated with mental illness. That these issues are directly correlated means that investment in initiatives that increase food security, as well as community cohesion and activation, will also greatly improve mental health, reduce suicides, and facilitate the redirection of funding towards more preventative health measures. This was one of the key findings in Sustain’s Pandemic Gardening Survey¹³ – 72% of the over 8,500 respondents identified that growing food greatly, or significantly improved their mental wellbeing (Figure 4).

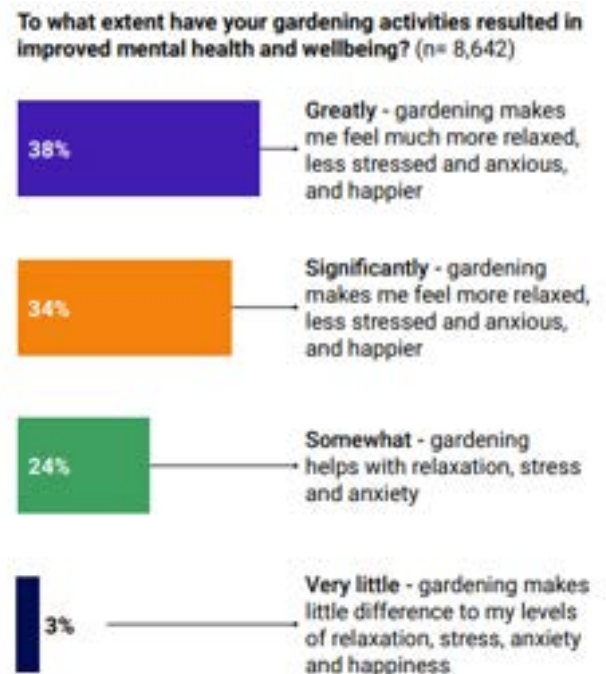


Figure 4: Pandemic Gardening survey (2020), Sustain

Food Insecurity and dietary-related disease

Having the right to a nutritious diet secured will greatly reduce the incidence of non-communicable disease leading to a healthier, more resilient population. As discussed below in Section 5 (Resourcing Food Security in Victoria), the Australian Institute of Health and Wellbeing has reported that dietary-related costs to the Australian health system currently exceed \$16 bn per year. Many of the top 20 disease risk factors are associated with low-quality diets. Moreover, almost all risk factors not directly tied to nutrition aggravate food insecurity (e.g. air pollution, childhood neglect, domestic violence, drug and alcohol use, occupational hazards, etc.). Many of these risk factors could be addressed and substantially reduced by ensuring all citizens have food and housing security.

¹³ Donati, K., & Rose, N. (2020). 'Every seed I plant is a wish for tomorrow': Findings and Action Agenda from the 2020 National Pandemic Gardening Survey. Melbourne, Victoria: Sustain: the Australian Food Network.

Some of the most prevalent conditions associated with poor quality diets include^{14,15,16,17,18}:

- Cardiovascular disease
- Diabetes
- Cancer
- Asthma
- Arthritis
- Kidney disease

The consequences of food insecurity for Victorians, as related to these dietary-related diseases include:

- Increased individual healthcare costs, impacting financial, housing, and food security
- Increased levels of stress

Again, all of these disease risk factors act in a reciprocal nature. As the burden of disease increases, people are more exposed to these risk factors, which leads to further infirmity. For example, people experiencing food insecurity are more likely to develop cardiovascular disease (Weaver and Fasel 2018). This may impact their ability to grow food, work, and / or their healthcare costs may worsen their levels of economic disadvantage. Consequently, with decreased mobility, or less financial income, their experience of food insecurity is likely to worsen, continuing a spiral of ever more illness and food insecurity. It is therefore imperative that positive food systems initiatives such as those outlined in the recommendations section of this report are implemented as a circuit breaker to this reciprocal spiral of disease, stress, and insecurity.

Food insecurity and cultural harm

It is also important to recognise that food is a central part of many people's cultural identity in Victoria. Growing, cooking, eating, and sharing food are all practices of cultural connection that may be impacted by experiences of food insecurity. The significance of this is highlighted in the Lancet Commission on Culture in Health.¹⁹ The Commission identified that positive cultural connections are key to achieving equity in health and wellbeing for all people. With food a central component of culture, it is imperative that to achieve health and wellbeing for all people,

¹⁴ Jo Weaver, L. and B. Fasel, C. (2018) *A Systematic Review of the Literature on the Relationships between Chronic Diseases and Food Insecurity*. *Food and Nutrition Sciences*, 9, 519-541.

¹⁵ Gregory, C. & Coleman Jenson, A. (2017). *Food insecurity, chronic disease, and health among working-age adults*. United States Department of Agriculture

¹⁶ Australia Institute of Family Studies (2011). *Food insecurity in Australia: What is it, who experiences it and how can child and family services support families experiencing it?*

¹⁷ Liu, Y. and Eicher-Miller, H.A. (2021) 'Food Insecurity and Cardiovascular Disease Risk', *Current Atherosclerosis Reports*, 23(6), p. 24.

¹⁸ Woodside, J.V. et al. (2023) 'Fruit and vegetable consumption as a preventative strategy for non-communicable diseases', *Proceedings of the Nutrition Society*. 2023/02/14 edn, 82(2), pp. 186–199.

¹⁹ Napier AD, Ancarno C, Butler B, et al. (2014). *Culture and health*. *Lancet*; 3-84: 1607-1639.

particularly for marginalised identities in Victoria, initiatives that guarantee food security for all are implemented.

First Peoples in Victoria experience some of the worst rates of health and wellbeing in Australia.²⁰ As outlined in the Medical Journal of Australia, the structural barriers that prevent connection to culture (including food sovereignty) are a major cause of these abhorrent statistics:

*In Australia, and around the world, various policies have perpetuated the systematic denial of the basic human rights of Indigenous peoples and other marginalised and vulnerable groups. These ongoing experiences of colonisation, exclusion and discrimination are critical to understanding the contemporary determinants of poor health that Aboriginal and Torres Strait Islander people (and other populations) continue to experience.*²¹

In 2022 researchers from Deakin University collaborated with six Aboriginal Community-Controlled Organisations to identify and articulate key actions needed 'to improve food environments and nutrition outcomes, so that Mob can grow up healthy and deadly.'²² The *Foodpath Report* identified five priority actions for government:

1. Ban junk food marketing in all its forms, including unhealthy sports sponsorship
2. Mandate nutrition and cooking education in schools
3. Make the Health Star Rating food labelling system mandatory across all packaged food
4. Set limits on the amount of sugar, salt and saturated fat allowed in packaged food
5. Keep GST off fresh food

Victoria also has a large migrant and refugee community whose connection to culture is vital to their wellbeing and ability to be prosperous, valuable members of society. Again, food is a central part of their cultural identity and currently, these diverse communities are also at high risk of food insecurity, particularly asylum seekers, and thus are likely to experience poor determinants of health as they become dislocated from culture and identity. A study of Asylum Seeker Resource Centre (ASRC) clients revealed that almost all had experienced food insecurity, a direct result of government policies that excluded them from economic participation or access to government benefits.²³

If the Victorian government is serious about providing an environment in which the First Peoples of this land, as well as those newly arriving, can live in a fulfilling, and culturally enriched way,

²⁰ Australian Institute of Health and Wellbeing (2024). *Health and wellbeing of First Nations people*.

²¹ Brown, N., Azzopardi, P.S. and Stanley, F.J. (2023) 'Aragung buraay : culture, identity and positive futures for Australian children: Dharawal language: aragung = shield for war, protection; buraay = child', *Medical Journal of Australia*, 219(S10).

²² <https://www.vaccho.org.au/foodpath/>

²³ McKay, F. H., & Dunn, M. (2015). Food security among asylum seekers in Melbourne. *Australian and New Zealand Journal of Public Health*, 39(4), 344-349.

then initiatives that improve food security as well as population health is of paramount importance. By implementing many of the recommendations outlined in this submission (particularly around access and affordability) the government will make substantial progress towards this policy goal.

Food insecurity and economic disadvantage

As stated above, food insecurity and economic disadvantage are reciprocal risk factors of each other. The Victorian Council of Social Services has stated that more than 800,000 Victorians are currently experiencing significant economic disadvantage.²⁴

Those experiencing economic disadvantage and concomitant food insecurity are also likely to face the non-exhaustive list of outcomes below:

- Lower levels of education
- Becoming unhoused
- Negative mental and physical health outcomes
- Domestic violence
- Unemployment

Again, we emphasised the interconnections between economic disadvantage, food insecurity, ill health and chronic disease. A clear demonstration of these links is the fact that increased stress levels caused by the current inequitable economy and social relations as well as the ongoing effects of colonialism, cause physical inflammation in the body. This physical inflammation is a major risk factor for heart disease, depression, diabetes, and Alzheimer's, as well as increasing the impacts of communicable illnesses such as Covid-19.²⁵ Combined with the concomitant physical and mental impacts of a poor diet, those experiencing economic disadvantage face severe health challenges due to the policy choices that have created these issues.

²⁴ VCOSS (2023). *Mapping poverty in Victoria*.

²⁵ Marya, R. and Patel, R. (2021). *Inflamed: Deep Medicine and the Anatomy of Injustice*. First edition. New York, Farrar, Straus and Giroux.



03 Drivers of food insecurity

Current economic paradigm – profit over people and planet

The current economic system, of which the food system is a major part, puts profit before people's health, wellbeing, and livelihoods, as well as the integrity of ecosystems and climatic stability. A defining feature of contemporary societies and economies is the concentration of wealth and power, with a resulting steep rise in inequality (Piketty 2015). Empirical research across OECD countries conclusively demonstrates that those with lower levels of inequality have consistently better outcomes in population health as well as all other social indicators; conversely, those with higher levels of inequality have much worse outcomes (Wilkinson and Pickett 2010). Australia is in the latter category and has been since the mid-1980s.

The role of the supermarket duopoly in the food system

As regards our food system, the most powerful actors are the two major supermarkets, Coles and Woolworths. Australia has one of the most concentrated supermarket sectors in the developed world (Merrett 2020). This effective situation of duopoly market power has enabled Coles and Woolworths to charge excessive prices (what some term "price gouging") and dictate unconscionable business terms with producers. These practices and the lack of effective competition in the Australian supermarket sector have been recognised as contributing factors to the rise in food poverty and food insecurity. This has been documented in submissions to the various inquiries that have taken place investigating supermarket prices and their impacts on both consumers and suppliers in the past year as well as by the published reports of those inquiries that have concluded.

These inquiries (including this current one by the LSC) were initiated partly in response to the justifiable widespread community anger at the \$1.1b and \$1.6b profits posted by Coles and Woolworths respectively in 2023, amidst a cost-of-living crisis that is pushing millions of Australians into poverty, housing stress and food insecurity. As one indicator of the scale and severity of the crisis, Foodbank's 2023 *Hunger Report* found that 3.7 million households (36%) 'experienced moderate to severe food insecurity'.²⁶

Australia's economic and competition policy is based on the prevailing economic orthodoxy of neoliberalism. According to its proponents and adherents, this orthodoxy assumes that when government regulation is removed, and the market (corporations) are allowed to regulate themselves, competition will flourish and prices will be fair for consumers. In other words, it's a 'win-win' situation (Laruffa 2022). Instead, we see corporations gaining more and more market dominance; the supermarket duopoly now controls more than 70% of the food retail market (Merrett 2020). Globally, just four companies control 80% of the agrichemical industry, and similarly for the seed industry, meatpacking, grain trading, oilseed crushing and virtually every sector of the industrialised food system (Keenan et al 2023). As has been documented through

²⁶ Foodbank (2023) *Hunger report*.

the various parliamentary and independent inquiries into supermarket prices, when corporate concentration increases, markets become less competitive, leading to consumers paying high prices and farmers receiving lower returns for their work.

Further to the in-text citations above, below are additional resources on the negative impacts of excessive corporate concentration and neoliberal market economics in agriculture and the food system:

- [Institute of Agriculture and Trade Policy – Corporate Concentration](#)
- [The Natural Farmer – concentration and power in the food system](#)
- [Jennifer Clapp - The rise of big food and agriculture: corporate influence in the food system](#)
- [Sustain’s Federal Supermarket Prices Inquiry submission](#)
- [Food security and neoliberalism in Australia](#)
- [Independent Australia article - food and neoliberalism](#)
- [Lucky Country](#)
- [Food Banks](#)

Cost of living crisis compounding years of inadequate social protection in Australia

We are currently facing unprecedented levels of food insecurity amidst the worst cost of living crisis in recent memory.

These cost-of-living pressures are a primary cause of the heartbreaking [21% rise in foodbank distributions](#), with demand for food relief growing every month. [In 2022, 2 million Victorians experienced severe food insecurity, defined by the United Nations](#) as a person or household running out of food and going an entire day without food at least once in a year. Amongst these 2 million Victorians were [over 365,000 children in Victoria, drastically impacting their ability to engage and learn at school](#). Foodbank data shows [that 70% of those facing food insecurity](#) also experience high levels of psychological distress; this would certainly include the parents of those food-insecure children.

It’s sobering to reflect that these statistics (the most recent we have) are from 2022, before the cost-of-living crisis intensified through successive interest rate rises and food price inflation. Current levels of food poverty and food insecurity are almost certainly significantly higher. This is confirmed by survey work that Sustain has carried out in numerous local government areas since early 2023. Using the best-practice USDA household food security module to assess the spectrum and severity of the experience of food insecurity, data from these surveys (conducted in the City of Banyule, Golden Plains Shire Council, the City of Casey, seven LGAs in the Goulburn Valley region and four LGAs in the Loddon Mallee region) consistently show an incidence of food insecurity of between 25%-40%. These are shockingly high rates for a state as wealthy as Victoria. Whilst we do not claim that these surveys are statistically significant, they

were distributed widely through social media and council websites and were not specifically targeting the food relief sector. If (as we suspect) these results reflect the experience elsewhere across Victoria, they paint a worrying picture and make the case for urgent and substantive action by this Committee and by the State government.

The cost-of-living crisis has been driven by multiple factors, including the economic paradigm detailed above, interest rate rises, inflation, corporate profits and (arguably) price-gouging, tax avoidance, stagnation of wages, and welfare income currently below the poverty line. The combined effect, as noted above, is rising levels of inequality, with an ever-increasing concentration of wealth. Due to the rising cost of food, housing, and other essential needs, people are now having to choose between healthcare and a healthy diet; between paying rent and giving their kids a nutritious lunchbox. See below for further resources:

- [The Conversation article – food price crisis and government response](#)
- [Foodbank – food insecurity and the cost-of-living crisis](#)
- [The Greens – Cost of living crisis](#)
- [Welfare income below the poverty line](#) – Melbourne Institute

Climate change and “heatflation”

The climate catastrophe is wreaking havoc with agriculture in Victoria. The shortening of the growing season as well as the increasing incidence of fires, floods, frosts, and drought make growing food in our state increasingly challenging. This will likely result in lower yields, damaged crops and lower farm profitability, all of which will place additional upwards pressures on food prices. This is so-called ‘heatflation’ effect, which recent modelling suggests could drive food price rises by as much as 3% per year in the next decade, on top of other inflationary pressures in the economy (Kotz et al 2024).

Current industrial agricultural practices are a leading cause of emissions in Australia, resulting in a situation in which farmers are sabotaging themselves – they generate unnecessary emissions causing global warming, which then leads to the extreme weather events described above. Alarmingly, the Garnaut Review (2008; see also Garnaut 2010) found that, under a business-as-usual scenario with minimal mitigation efforts, irrigated agriculture will be effectively impossible in the Murray-Darling basin by the end of the century. That Basin currently produces 40% of all food and fibre grown in Australia.²⁷

This is not, however, the fault of farmers, with many encouraged and locked into these modes of farming by government policy, corporations, and the neoliberal economic paradigm described above. For example, the government and corporate promotion of synthetic fertilisers

²⁷ <https://farmers.org.au/news/why-australias-food-bowl-the-murray-darling-basin-is-making-headlines/#:~:text=About%2040%25%20of%20Australia's%20food,People>.

increased yields and efficiency from the Green Revolution until now. However, the production and use of these fertilisers are a primary source of agricultural greenhouse gas emissions.

While greenhouse gas emissions have always been a part of agriculture, a shift to agroecological and regenerative practices, as well as localising food systems and economies, have been demonstrated to greatly reduce emissions and play an important role in sequestering carbon, as these resources demonstrate:

- [Department of Agriculture, Fisheries, and Forests – Climate Change and the Agriculture Sector](#)
- [Feeding a Hungry Nation: Climate Change, Food and Farming in Australia](#)
- [CSIRO carbon sequestration](#)
- [Western Australia Government – Carbon Farming](#)
- [American Farmland Trust – Climate Change and Regenerative Agriculture](#)
- [University of Vermont – Using Regenerative Agriculture to Combat Climate Change](#)
- [Journal of Agrarian Change – Industrial Capitalist Agriculture](#)

Ecological degradation/loss of biodiversity

In addition to climate-related farming challenges from industrialised agriculture, many of the associated practices (using synthetic fertilisers, pesticides, using heavy machinery, etc.) have led to ecological degradation, loss of biodiversity, and poor-quality soil. For instance, the use of synthetic fertilisers heavily reduces the soil's microbial and nutrient content of the soil. This creates a reliance on using more and more agrochemicals to maintain yields. This results in farmers spending more money on agrochemical inputs, and therefore driving up the price of food and/or putting more financial stress on farmers.

- [FoodPrint – The impacts of industrial agriculture on soil health](#)
- [Australian Organic – Soil Health Position](#)
- [ABC – Soil Health and Fertiliser Prices](#)



04 Evidence-Based Initiatives, Strategies, and Plans

Key issues facing food relief and social support services

Here we summarise key insights from recent in-depth qualitative and quantitative research we have conducted in the past 18 months in the Melbourne metropolitan area.

Growing demand: Increasing demand for food relief and social support services was consistently reported, with many agencies recording a doubling in demand in the 12 months to June 2023

Most common cohorts: The most common cohorts seeking support were unemployed people, people living on government benefits, international students, low-income households, people without a home, new migrants and asylum seekers and First Nations people.

Emerging cohorts: Growing demand for food relief from new cohorts including working families and mortgage holders on low to middle incomes.

Increased client complexity: Food relief recipients are presenting with more complex and compounding needs including housing insecurity or homelessness, mental health issues and family violence.

Cohorts slipping through the cracks: Older adults, asylum seekers/new migrants, international students, sole parent families and low-income workers were identified as less likely to accessing support despite need.

Decreased funding: Many community organisations are under-resourced and at capacity. Decreases in government grants and philanthropic funding are pressing challenges. Funding uncertainty stifles capacity for service innovation or improvement. Grant funding is also insufficient to cover indirect costs of service delivery, such as staffing costs, or to keep up with demand.

Insecure staffing: Most food relief organisations in the inner metro region rely heavily on volunteers relative to paid staff. Short-term funding contracts contribute to high staff turnover,

the loss of critical networks, trusted contact points for clients, organisational knowledge and a sense of constantly “reinventing the wheel”.

Information resources: Up-to-date information about social support and food relief services is critical to effective referrals. Maintaining timely information is challenging. Many agencies are at capacity and unable to regularly update details. Ask Izzy, a centralised database of services, is not always current despite best efforts. In some cases, services listed on agencies’ own websites are out-of-date. Rough sleepers rely heavily on word of mouth for information about the best services.

Referral processes: Word of mouth and agency networks are critical to referral pathways. However, long waiting times due to organisations operating at capacity was identified as a problem. When referring clients to other social support services, nearly a third of agencies said they “were not confident at all that their clients’ needs would be met”. None were very confident.

Data collection: Services with minimal eligibility requirements and a ‘no questions asked’ approach are considered best-practice by service providers and people with lived experience because it maintains confidentiality and dignity, reduces stigma and reduces cognitive demand on hungry people operating in a state of crisis. However, this presents challenges for data collection for monitoring cohorts.

Needs and priorities of those with lived experience of food insecurity

Challenges accessing services: Navigating and accessing services is complex and time-consuming due to distribution and diversity in services, different opening hours and some targeting specific cohorts. Service access is compounded by transport challenges and costs, particularly for homeless people.

Co-locating services: Participants noted that the convenience of co-located and co-designed services were enormously beneficial for mental and physical wellbeing by reducing emotional, time and financial barriers to accessing services.

Catering for diverse needs: There is a wide diversity of needs in the community with no one-size-fits-all solution. No- or low-cost markets, municipal markets, supermarket models, pantries, food parcels, frozen or hot meals, alongside informal and relational-based connections, each serve different community needs.

Volunteer preparedness: Food relief volunteers are sometimes poorly trained or prepared for the sensitivities required for dignified food relief. This is exacerbated by under-resourcing which impacts volunteer training.

Food quality: Poor quality food or being offered food that doesn't meet people's circumstances or needs was a common concern. Examples include giving pouches of food that require cooking to people without access to cooking facilities or offering bread to people with gluten intolerance.

Choice and agency: While the types of food relief and social support services are highly diversified across metropolitan Melbourne, best-practice service delivery prioritises choice and agency for recipients. While many agencies identified choice and agency as important, this is not always possible due to funding constraints.

In Appendix B we share recent analysis and benchmarking of Victorian and international case studies and exemplars on innovative models, programs and policies to tackle food insecurity. As indicated, community organisations in Victoria already have many of the solutions that respond directly and in a dignified manner to the priority needs of vulnerable Victorians. These initiatives need to be expanded and resourced by the State government to enable improved access to healthy, nutritious food.



05 Resourcing Food Security Solutions in Victoria

Spending money on implementing the above recommendations, and creating an equitable, affordable, and sustainable food system needs to be recognised as a necessary and overdue investment in preventative public health as well as a serious commitment to the realisation of the human right to good food for all Victorians. A thriving food system can act to reduce long term costs associated with dietary ill-health and disease, mental ill-health and the destructive impacts of an industrial model of agriculture that are no longer suitable for the 21st century. A healthy and sustainable food system for Victoria will make a major contribution to climate mitigation and adaptation as well as strengthening community resilience²⁸. It can create new jobs for thousands of Victorians²⁹, reduce sick days³⁰, and help children to learn more effectively on the foundation of a healthy, nutritious diet.³¹

A thriving, healthy, and nutritious food system is an investment in preventative health, achieving:

- Reduced incidence of non-communicable disease through:
 - Reducing the amount of ultra-processed foods in our diets that cause these diseases^{32, 33}
 - Increasing the amount of vegetables, fruit, protein, and fibre in our diets, to lower the risk of preventable, chronic dietary-related disease^{34, 35}
- Improved mental health and wellbeing through better nutrition, higher rates of active participation in society and work, as well as greater community connection³⁶

²⁸ Food Systems Economic Commission (2024). *The Economics of the Food System Transformation. Food System Economics Commission, Global Policy Report.*

²⁹ Farm to Plate (2021). *Vermont Agriculture & Food System Plan 2021-2030.*

³⁰ Fanzo, J. et al. (2021) 'Sustainable food systems and nutrition in the 21st century: a report from the 22nd annual Harvard Nutrition Obesity Symposium', *The American Journal of Clinical Nutrition*, 115(1), pp. 18–33.

³¹ Glewwe, P., Jacoby, H.G. and King, E.M. (2001) 'Early childhood nutrition and academic achievement: a longitudinal analysis', *Journal of Public Economics*, 81(3), pp. 345–368.

³² Henney, A.E. et al. (2024) 'Ultra-processed food and non-communicable diseases in the United Kingdom: A narrative review and thematic synthesis of literature', *Obesity Reviews*, 25(4), p. e13682.

³³ Machado, P.P. et al. (2019) 'Ultra-processed foods and recommended intake levels of nutrients linked to non-communicable diseases in Australia: evidence from a nationally representative cross-sectional study', *BMJ open*, 9(8), p. e029544.

³⁴ National Institute of Health (2017). *How dietary factors influence disease risk. US Department of Health and Human Services*

³⁵ World Health Organization (n.d.). *Healthy diet.*

³⁶ Jones, A.D. (2017) 'Food Insecurity and Mental Health Status: A Global Analysis of 149 Countries', *American Journal of Preventive Medicine*, 53(2), pp. 264–273.

- Reduced amounts of synthetic agricultural inputs such as pesticides that have well-established links to cancer, asthma, food intolerances, and several other health risks^{37, 38, 39, 40, 41, 42, 43}
- Mitigation of the worst-case climate change scenarios via emissions reduction, and climate resilience associated with a localised, agroecological food system^{44, 45, 46, 47}
- Improved epidemic resilience through a healthy localised food system^{48, 49, 50}

Payroll tax surcharge to establish a Food Systems and Food Security Fund

Several mechanisms could be used by the State government to secure funding for this investment. First, an additional 0.25% - 0.5% could be added to the existing payroll tax surcharge. Currently, 1% - 2% of the payroll tax surcharge is earmarked for mental health and wellbeing, and for the COVID-19 debt repayment, raising over \$1 bn in FY 2024-5.⁵¹

Considering that implementing the recommendations outlined in this submission would improve mental health, as well as increase resilience against future epidemics, extreme weather events, and other foreseeable societal shocks and crises, we believe that this mechanism is appropriate for the creation of a Victoria Food Systems and Food Security Fund. An extra 0.25% - 0.5% on the existing surcharge would raise \$250m - \$500m per annum, which could be used to expand funding for existing and emerging initiatives such as:

³⁷ Koutros, S. et al. (2009) 'Aromatic amine pesticide use and human cancer risk: results from the U.S. Agricultural Health Study', *International journal of cancer. Journal international du cancer*, 124(5), pp. 1206–1212.

³⁸ Searles Nielsen, S. et al. (2010) 'Childhood brain tumors, residential insecticide exposure, and pesticide metabolism genes', *Environmental Health Perspectives*, 118(1), pp. 144–149.

³⁹ Gatto, N.M., Ogata, P. and Lytle, B. (2021) 'Farming, Pesticides, and Brain Cancer: A 20-Year Updated Systematic Literature Review and Meta-Analysis', *Cancers*, 13(17), p. 4477.

⁴⁰ Barrett, J.R. (2010) 'Critical Confluence: Gene Variants, Insecticide Exposure May Increase Childhood Brain Tumor Risk', *Environmental Health Perspectives*, 118(1), p. A35.

⁴¹ Mills, P.K. (1998) 'Correlation analysis of pesticide use data and cancer incidence rates in California counties', *Archives of Environmental Health*, 53(6), pp. 410–413.

⁴² Panis, C. and Lemos, B. (2024) 'Pesticide exposure and increased breast cancer risk in women population studies', *Science of The Total Environment*, 933, p. 172988.

⁴³ Panis, C. and Lemos, B. (2024) 'Pesticide exposure and increased breast cancer risk in women population studies', *Science of The Total Environment*, 933, p. 172988.

⁴⁴ Schulte, L.A. et al. (2022) 'Meeting global challenges with regenerative agriculture producing food and energy', *Nature Sustainability*, 5(5), pp. 384–388.

⁴⁵ Committee on Developing a Research Agenda for Carbon Dioxide Removal and Reliable Sequestration et al. (2019) *Negative Emissions Technologies and Reliable Sequestration: A Research Agenda*. Washington, D.C.: National Academies Press, p. 25259.

⁴⁶ Brown, K., Schirmer, J. and Upton, P. (2022) 'Can regenerative agriculture support successful adaptation to climate change and improved landscape health through building farmer self-efficacy and wellbeing?', *Current Research in Environmental Sustainability*, 4, p. 100170.

⁴⁷ Amoak, D., Luginaah, I. and McBean, G. (2022) 'Climate Change, Food Security, and Health: Harnessing Agroecology to Build Climate-Resilient Communities', *Sustainability*, 14(21), p. 13954.

⁴⁸ Zhan, Y. and Chen, K.Z. (2021) 'Building resilient food system amidst COVID-19: Responses and lessons from China', *Agricultural Systems*, 190, p. 103102..

⁴⁹ Boyacı-Gündüz, C.P. et al. (2021) 'Transformation of the Food Sector: Security and Resilience during the COVID-19 Pandemic', *Foods*, 10(3), p. 497..

⁵⁰ Foodprint Melbourne (2022), Report: The resilience of Melbourne's food system.

⁵¹ <https://www.sro.vic.gov.au/payroll-tax-surcharges>

- **Cash-first responses to food poverty**, e.g. through the provision of vouchers that support local businesses such as greengrocers and sustainable local bulk food stores
- **Dignified and proven food security enterprises** such as [Community Grocer](#)
- **Initiatives that provide dignified access to healthy food for students** such as Just Food Collective's [WellFed project](#) (currently funded by the City of Melbourne)
- **Regional food hubs** such as those supported by the [VicHealth Foodhub model](#)
- **Urban agriculture food justice projects** such as [Oakhill Food Justice Farm](#) and the [Veggie Empire](#)
- **Subsidised agroecological training** for farmers
- Development and implementation of **local government local food system and food security strategies** (Sustain has directly coordinated and / or supported the development of several of these – see Appendix A)

Land banking and targeted land tax

Secondly, the State government could implement a new targeted land tax specifically for land owned and purchased by the major supermarket chains (MSC) and the major fast-food chains.

Supermarkets

As extensively reported by the media in recent months, exposed in Federal Senate Estimates hearings, and repeatedly outlined in submissions to the [Senate Inquiry into Supermarket Prices](#), the major supermarket chains (MSCs) are reaping record profits during the current severe cost of living crisis. As acknowledged in the report of the Senate Inquiry as well as the ACTU's [Inquiry into Price Gouging and Unfair Pricing Practices](#) (2023), the excessive concentration of market power in Australia's supermarket sector results in a lack of competition which allows supermarkets to charge excessively high prices on many essential grocery items. This is undeniably a contributing factor to the steep rise in food poverty and food insecurity, which many submissions to both Inquiries, as well as the [Queensland Supermarket Pricing Select Committee Inquiry](#) (May 2024).

As outlined in Sustain's submission to the Senate Inquiry and documented in the Inquiry report, the MSCs have also engaged in unconscionable business practices, including land banking and monopolising food retail options in new housing developments, subsequently allowing them to increase prices, and reduce access to healthy, local food. To address these unconscionable practices and begin to tackle the negative externalities caused by excessive monopoly power, an additional land tax could be levied on land owned by the MSCs. The funds raised could be used to support the range of initiatives and projects outlined above and in Appendix B. It could also be used to support and expand existing farmers and municipal markets, as well as help establish new local and affordable produce markets in low socio-economic areas and regions.

These measures would foster greater competition in the retail sector, affordable access to healthy food for the most vulnerable, and offer farmers access to more diversified and direct markets.

Vacant Residential Land Tax

As with the Payroll Tax Surcharge, Victoria already has a mechanism to tackle land banking and incentivise property owners to increase access to affordable housing. This is the [Vacant Residential Land Tax](#) (VRLT), introduced by the Victorian government in a limited form in January 2018 and then significantly expanded in December 2023 to apply to all residential land in Victoria if the land is vacant for more than 6 months in the preceding calendar year, with increasing rates the longer the land is left vacant. From January 2026 the VRLT will be extended to 'unimproved residential land that has remained undeveloped for at least 5 years and is capable of residential development'.⁵²

While this is a welcome measure and will hopefully reduce the practice of land banking by commercial property developers, the tax is limited to 'residential land'. We argue that this form of land tax should also apply to commercially zoned land, especially land owned by the MSCs in growth-area suburbs and neighbourhoods that is, by their own admission, held in waiting, sometimes for years, until sufficient development has occurred to justify the building of a new supermarket. Having regard to other serious problems that the MSCs are causing in Victoria's food system, we argue for a 5% tax on the Capital Improved Value of such land banking holdings, rising by an additional 1% for every year that the MSC is subject to this land tax.

Again, the proceeds from this land tax could be used to fund an expanded Victorian Food Systems and Food Security Fund. An example of such fiscal innovation can be seen through the [Community Preservation Act](#), legislated by the City of Boston in 2016 following a popular plebiscite of all residents eligible to vote. The Act created a 1% additional property tax on all residential and business holdings, with the funds raised used to finance affordable housing, historic preservation, open space and public recreation. In 2023 the Community Preservation Fund [supported 56 projects with \\$USD40 mn in grants](#).

Fast food chains

In addition to hypothecated land tax levies on the supermarket duopoly, land and buildings that are owned by major fast food chains (MacDonalds, KFC, Dominos, Hungry Jacks, Subway), could also be subjected to a new dedicated land tax. As with the supermarket duopoly, the justification for such a tax would be the negative role that these fast food outlets play in Victoria's food system and the very substantial negative externalities in terms of the burden on

⁵² <https://www.sro.vic.gov.au/vacant-residential-land-tax>

the health system that they generate. Planning decisions made by the Victorian government in the early 1990s ensured an enormous increase in these outlets, with more than 1000 stores now in operation across Victoria.⁵³ Just in the decade 2008-2018 these outlets increased by 92% in Melbourne’s growth-area suburbs, with ‘an average of nine unhealthy food outlets for every one healthy food outlet’, leading to these suburbs being accurately described as ‘food swamps’.⁵⁴ Typically, these outlets are concentrated in lower socioeconomic suburbs, and often cluster close to primary and secondary schools in those localities (Thornton et al 2016).

What we see at play here are the ‘commercial determinants of health’, defined as:

[S]trategies and approaches used by the private sector to promote products and choices that are detrimental to health. This single concept unites a number of others: at the micro-level, these include consumer and health behaviour, individualisation, and choice; at the macro-level, the global risk society, the global consumer society, and the political economy of globalisation (Kickbush et al 2016).



Figure 4: Commercial determinants of health. From Kickbusch I, Allen L, Franz C. The commercial determinants of health. *The Lancet Global Health*. 2016 Dec 1;4(12): e895-6. Republished with permission from the authors in Rose et al (2022)

⁵³ Taylor, E.J. (2015). [Fast food planning conflicts in Victoria 1969-2012: is every unhappy family restaurant unhappy in its own way?](#) *Australian Planner* 52(2): 114-26.

⁵⁴ Needham, C., Orellana, L., Allender, S., Sacks, G., Blake, M. R., & Strugnell, C. (2020). [Food retail environments in Greater Melbourne 2008–2016: Longitudinal analysis of intra-city variation in density and healthiness of food outlets.](#) *International journal of environmental research and public health*, 17(4), 1321.

Writing in 2022, Sustain Executive Director Dr Nick Rose and his fellow authors argued:

“With diet now overtaking tobacco as the leading cause of ill-health and disease in many countries, including Australia, the lessons of the experience with tobacco harm reduction policies, as well as the experience to date of policy and regulatory efforts to reduce the consumption of SSBs and junk food, are clear. The [WHO] MPOWER framework is a valuable precedent that could be adapted and applied to reduce harm from unhealthy foods and beverages. Facing down industry arguments about the alleged economic impacts of effective public health measures is essential. Taxation and price increases of unhealthy and addictive products work; and the revenue raised can be, and is being, invested in low-income communities to improve health outcomes and enhance quality of life. Prominent front-of-pack warnings and mass media campaigns are also effective, as is the banning of sponsorship of major sports and denying harmful industries the ability to burnish their public image through so-called corporate social responsibility. In the growth area context of sprawling cities in Australia and elsewhere, reforms to the planning framework to empower local governments to refuse applications for new fast food restaurants and thereby reduce the food swamp phenomenon that plagues these suburbs is clearly in accordance with good public health policy. It should, we argue, form part of an equivalent and adapted MPOWER framework for transforming the contemporary food system into one that more fully promotes health, equity and environmental sustainability (see Table 1) Ultimately, however, political will is required to overcome the corporate determinants of health...in order to govern in a manner consistent with optimum public health outcomes.”

While this article focused on the negative public health impacts of the fast food industry and the regulatory, planning and fiscal measures needed to address those impacts effectively, the same logic applies to the equally pressing issue of food poverty, food insecurity and affordable food access. What Victoria needs is a comprehensive and integrated approach to the food system that addresses the challenges of the system in all their complexity, recognising their unavoidably interconnected nature. People experiencing food insecurity will of course seek lower priced food that is convenient and available. Frequently, this is provided by the major fast food chains. It is no coincidence that these outlets cluster in low socioeconomic suburbs in Melbourne and elsewhere in Victoria. However, the food and beverages they serve do not promote health and wellbeing; on the contrary, they contribute to the burden of chronic, dietary-related ill-health. The experience of food insecurity and food poverty is worsened by this situation, which contributes to mental ill-health, in a vicious cycle. Governments around the world recognise this and are acting on it. It is time for Victoria to follow their lead.

Table 1

Summary of reform measures for SSBs, tobacco and unhealthy food

SSB Policy Interventions—Krieger et al	MPOWER—WHO Framework Convention on Tobacco	MPOWER—Food system reform recommendations
Financial e.g. taxes, restrictions on discounting	Monitor usage	Monitor consumption of unhealthy foods and beverages (including fast food) and rates of obesity / ill-health
Information / Advertising e.g. warning labels	Protect from tobacco smoke	Protect children and youth from marketing for unhealthy foods and beverages
Default provision —mandatory healthy options	Offer support to quit	Offer healthy food retail, food growing spaces, etc
Availability —procurement, healthy retail	Warn about dangers	Warn about dangers of unhealthy foods/beverages with mandatory front-of-pack labelling
	Enforce bans on advertising / sponsorship	Enforce bans on advertising / sponsorship by fast food restaurant companies and other food companies with portfolios of mainly unhealthy products
	Raise taxes on tobacco	Raise taxes on unhealthy & addictive food and beverage products / restrict discounting
		Reform State planning provisions to restrict the opening of unhealthy food retail outlets and encourage the opening of healthy food retail outlets

Figure 6: Food system reform recommendations, from Rose et al 2022. Barriers and Enablers for Healthy Food Systems and Environments: The Role of Local Governments.

Federal funding

To be able to implement all the recommendations contained in our submission, and to truly build an equitable, healthy, and sustainable food system, we will require large-scale and sustained investment, part of which must come from the Commonwealth. As part of a sufficient funding strategy, the Victorian government must advocate to the Commonwealth for increased funding for food systems transformation. This is in accordance with the recommendations contained in *Australian Food Story: Feeding the Nation and Beyond (2023)*, the Federal parliamentary Inquiry line with the Federal Government's own advice via the 2023 National Food Systems Inquiry Report, throughout which, the recommendations echoed much of what is outlined in this submission.

The Australian Institute of Health and Wellbeing has reported that diet related costs to the Australian health system currently exceed \$16 bn per year. By implementing the recommendations outlined in this section, that figure would likely decrease dramatically as many of the highest disease risk factors (dietary, high blood plasma glucose, high blood pressure, high cholesterol, impaired kidney function, iron deficiency, low birth weight, etc.) are reduced via a healthy diet. Taking this into account, it becomes clear that investment into our food and farming system will not only create a thriving, resilient, and nourished population, but it will also reduce State and federal government spending overall.

Demonstrating this on a global scale, researchers at Oxford University and London School of Economics found that transforming the food system to one that is healthier, equitable, and sustainable would create \$10 trillion USD in benefits per year, requiring less than 5% of that figure in investment (Food Systems Economic Commission, 2024).

Policy investments by state and federal government in poverty reduction would not only lead to direct improvements in food security but may also have the potential to reduce the costs of physical and mental health associated with it.



References

Amoak, D., Luginaah, I. and McBean, G. (2022) 'Climate Change, Food Security, and Health: Harnessing Agroecology to Build Climate-Resilient Communities', *Sustainability*, 14(21), p. 13954. Available at: <https://doi.org/10.3390/su142113954>.

Australia Institute of Family Studies (2011). *Food insecurity in Australia: What is it, who experiences it and how can child and family services support families experiencing it?*
 Australian Institute of Health and Wellbeing (2022). Social and Economic Factors associated with Suicide in Australia: A Focus on Individual Income

Australian Institute of Health and Wellbeing (2024). Health and wellbeing of First Nations people. Available at: [Health and wellbeing of First Nations people - Australian Institute of Health and Welfare \(aihw.gov.au\)](https://www.aihw.gov.au/health-and-wellbeing-of-first-nations-people)

Barrett, J.R. (2010) Critical Confluence: Gene Variants, Insecticide Exposure May Increase Childhood Brain Tumor Risk, *Environmental Health Perspectives*, 118(1), p. A35.

Behen, T. (2024) Report: The Resilience of Melbourne's Food System, Foodprint Melbourne. Available at: <https://science.unimelb.edu.au/foodprint-melbourne/publications/report-resilience-assessment-of-melbournes-food-system> (Accessed: 13 July 2024).

Boyacı-Gündüz, C.P. et al. (2021) Transformation of the Food Sector: Security and Resilience during the COVID-19 Pandemic. *Foods*, 10(3), p. 497. Available at: <https://doi.org/10.3390/foods10030497>.

Brown, K., Schirmer, J. and Upton, P. (2022) 'Can regenerative agriculture support successful adaptation to climate change and improved landscape health through building farmer self-efficacy and wellbeing?', *Current Research in Environmental Sustainability*, 4, 100170. Available at: <https://doi.org/10.1016/j.crsust.2022.100170>.

Brown, N., Azzopardi, P.S. and Stanley, F.J. (2023) 'Aragung buraay : culture, identity and positive futures for Australian children: Dharawal language: *aragung* = shield for war, protection; *buraay* = child', *Medical Journal of Australia*, 219(S10). Available at: <https://doi.org/10.5694/mja2.52139>.

Cain, K.S. et al. (2022) 'Association of Food Insecurity with Mental Health Outcomes in Parents and Children', *Academic Pediatrics*, 22(7), pp. 1105–1114. Available at: <https://doi.org/10.1016/j.acap.2022.04.010>.

Cho, J. (2023) 'The longitudinal reciprocal relationship between food insecurity and depressive symptoms among Korean elderly who live in poverty: application of auto-regressive cross-lagged model', *Asia Pacific Journal of Social Work and Development*, 33(2), 86–100. Available at: <https://doi.org/10.1080/02185385.2022.2048414>.

Committee on Developing a Research Agenda for Carbon Dioxide Removal and Reliable Sequestration et al. (2019) *Negative Emissions Technologies and Reliable Sequestration: A Research Agenda*. Washington, D.C.: National Academies Press, 25259. Available at: <https://doi.org/10.17226/25259>.

Donati, K., & Rose, N. (2020). 'Every seed I plant is a wish for tomorrow': Findings and Action Agenda from the 2020 National Pandemic Gardening Survey. Melbourne, Victoria: Sustain: the Australian Food Network. Available at: [The Pandemic Gardening Survey Report | Sustain](#).

Fanzo, J. et al. (2021) 'Sustainable food systems and nutrition in the 21st century: a report from the 22nd annual Harvard Nutrition Obesity Symposium', *The American Journal of Clinical Nutrition*, 115(1), 18–33. Available at: <https://doi.org/10.1093/ajcn/nqab315>.

Garnaut, R. (2008). *The Garnaut Climate Change Review*. Cambridge University Press, Melbourne, Available from URL: <http://www.garnautreview.org.au>

Garnaut R (2010) Climate change and the Australian agricultural and resource industries. *The Australian Journal of Agricultural and Resource Economics* 54: 9–25. Available at: <https://doi.org/10.1111/j.1467-8489.2009.00481.x>

Gatto, N.M., Ogata, P. and Lytle, B. (2021) 'Farming, Pesticides, and Brain Cancer: A 20-Year Updated Systematic Literature Review and Meta-Analysis', *Cancers*, 13(17), p. 4477. Available at: <https://doi.org/10.3390/cancers13174477>.

Glewwe, P., Jacoby, H.G. and King, E.M. (2001) 'Early childhood nutrition and academic achievement: a longitudinal analysis', *Journal of Public Economics*, 81(3), 345–368. Available at: [https://doi.org/10.1016/S0047-2727\(00\)00118-3](https://doi.org/10.1016/S0047-2727(00)00118-3).

Graham, C. and Ciciurkaite, G. (2023) 'The Risk for Food Insecurity and Suicide Ideation among Young Adults in the United States: The Mediating Roles of Perceived Stress and Social Isolation', *Society and Mental Health*, 13(1), 61–78. Available at: <https://doi.org/10.1177/21568693221120066>.

Gregory, C. & Coleman Jenson, A. (2017). *Food insecurity, chronic disease, and health among working-age adults*. United States Department of Agriculture

Henney, A.E. et al. (2024) 'Ultra-processed food and non-communicable diseases in the United Kingdom: A narrative review and thematic synthesis of literature', *Obesity Reviews*, 25(4), e13682. Available at: <https://doi.org/10.1111/obr.13682>.

Hodgetts, D., Chamberlain, K., Groot, S., & Tankel, Y. (2014). Urban poverty, structural violence and welfare provision for 100 families in Auckland. *Urban Studies*, 51(10), 2036-2051. Available at: <https://doi.org/10.1177/0042098013505885>.

Jones, A.D. (2017) 'Food Insecurity and Mental Health Status: A Global Analysis of 149 Countries', *American Journal of Preventive Medicine*, 53(2), 264–273. Available at: <https://doi.org/10.1016/j.amepre.2017.04.008>.

Keenan, L., Monteath, T., & Wójcik, D. (2023). Hungry for power: Financialization and the concentration of corporate control in the global food system. *Geoforum*, 147, 103909. Available at: <https://doi.org/10.1016/j.geoforum.2023.103909>

- Kickbusch I, Allen L, Franz C. The commercial determinants of health. *The Lancet Glob Health*. 2016;4(12):e895–6. Available at [https://www.thelancet.com/journals/langlo/article/PIIS2214-109X\(16\)30217-0/fulltext](https://www.thelancet.com/journals/langlo/article/PIIS2214-109X(16)30217-0/fulltext)
- Kleve, S. et al. (2018) 'Walking the Food Security Tightrope—Exploring the Experiences of Low-to-Middle Income Melbourne Households', *International Journal of Environmental Research and Public Health*, 15(10). Available at: <https://doi.org/10.3390/ijerph15102206>.
- Kotz, M., Kuik, F., Lis, E., & Nickel, C. (2024). Global warming and heat extremes to enhance inflationary pressures. *Communications Earth & Environment*, 5(1), 116. Available at: <https://www.nature.com/articles/s43247-023-01173-x>.
- Koutros, S. et al. (2009) 'Aromatic amine pesticide use and human cancer risk: results from the U.S. Agricultural Health Study', *International journal of cancer. Journal international du cancer*, 124(5), pp. 1206–1212. Available at: <https://doi.org/10.1002/ijc.24020>.
- Laruffa, F. (2022). Neoliberalism, economization and the paradox of the new welfare state. *European Journal of Sociology/Archives Européennes De Sociologie*, 63(1), 131-163. Available at: <https://www.cambridge.org/core/journals/european-journal-of-sociology-archives-europeennes-de-sociologie/article/neoliberalism-economization-and-the-paradox-of-the-new-welfare-state/B3D839010EDEF4F3949D9396D46017E>
- Liu, Y. and Eicher-Miller, H.A. (2021) 'Food Insecurity and Cardiovascular Disease Risk', *Current Atherosclerosis Reports*, 23(6), 24. Available at: <https://doi.org/10.1007/s11883-021-00923-6>.
- Macassa, G., McGrath, C., Rashid, M., & Soares, J. (2021). Structural violence and health-related outcomes in Europe: a descriptive systematic review. *International journal of environmental research and public health*, 18(13), 6998. Available at: <https://doi.org/10.3390/ijerph18136998>.
- Machado, P.P. et al. (2019) 'Ultra-processed foods and recommended intake levels of nutrients linked to non-communicable diseases in Australia: evidence from a nationally representative cross-sectional study', *BMJ Open*, 9(8), e029544. Available at: <https://doi.org/10.1136/bmjopen-2019-029544>.
- Markwick, A., Ansari, Z., Sullivan, M., & McNeil, J. (2014). Social determinants and lifestyle risk factors only partially explain the higher prevalence of food insecurity among Aboriginal and Torres Strait Islanders in the Australian state of Victoria: a cross-sectional study. *BMC public health*, 14, 1-10. Available at: <https://link.springer.com/article/10.1186/1471-2458-14-598>.
- Marya, R. and Patel, R. (2021). *Inflamed: Deep Medicine and the Anatomy of Injustice*. First edition. New York, Farrar, Straus and Giroux.
- McKay, F. H., & Dunn, M. (2015). Food security among asylum seekers in Melbourne. *Australian and New Zealand Journal of Public Health*, 39(4), 344-349.
- Merrett, D. T. (2020). The making of Australia's supermarket duopoly, 1958–2000. *Australian Economic History Review*, 60(3), 301-321. Available at: <https://doi.org/10.1111/aehr.12172>

Mills, P.K. (1998) 'Correlation analysis of pesticide use data and cancer incidence rates in California counties', *Archives of Environmental Health*, 53(6), 410–413. Available at: <https://doi.org/10.1080/00039899809605729>.

Myers, C.A. (2020) 'Food Insecurity and Psychological Distress: a Review of the Recent Literature', *Current Nutrition Reports*, 9(2), 107–118. Available at: <https://doi.org/10.1007/s13668-020-00309-1>.

Napier AD, Ancarno C, Butler B, et al. (2014). Culture and health. *Lancet*; 3-84: 1607-1639.

National Institutes of Health (2017). How dietary factors influence disease risk Available at: <https://www.nih.gov/news-events/nih-research-matters/how-dietary-factors-influence-disease-risk> (Accessed: 13 July 2024). <https://us.macmillan.com/books/9780374602529/inflamed>

Needham, C., Orellana, L., Allender, S., Sacks, G., Blake, M. R., & Strugnell, C. (2020). [Food retail environments in Greater Melbourne 2008–2016: Longitudinal analysis of intra-city variation in density and healthiness of food outlets](#). *International Journal of Environmental Research and Public Health*, 17(4), 1321.

Panis, C. and Lemos, B. (2024) 'Pesticide exposure and increased breast cancer risk in women population studies', *Science of The Total Environment*, 933, 172988. Available at: <https://doi.org/10.1016/j.scitotenv.2024.172988>.

Piketty, T. (2015). *The Economics of Inequality: Harvard University Press*. Harvard University Press.

Pourmotabbed, A. et al. (2020) 'Food insecurity and mental health: a systematic review and meta-analysis', *Public Health Nutrition*. 2020/03/16 edn, 23(10), pp. 1778–1790. Available at: <https://doi.org/10.1017/S136898001900435X>.

Rose, N., Reeve, B., & Charlton, K. (2022). Barriers and enablers for healthy food systems and environments: the role of local governments. *Current nutrition reports*, 11(1), 82-93.

Schulte, L.A. et al. (2022) 'Meeting global challenges with regenerative agriculture producing food and energy', *Nature Sustainability*, 5(5), 384–388. Available at: <https://doi.org/10.1038/s41893-021-00827-y>.

Searles Nielsen, S. et al. (2010) 'Childhood brain tumors, residential insecticide exposure, and pesticide metabolism genes', *Environmental Health Perspectives*, 118(1), 144–149. Available at: <https://doi.org/10.1289/ehp.0901226>.

Stack, S. (2021) 'Contributing factors to suicide: Political, social, cultural and economic', *Suicide Prevention*, 152, 106498. Available at: <https://doi.org/10.1016/j.ypped.2021.106498>.

Suicide Prevention Australia (September 2022). *State of the Nation in Suicide Prevention: A Survey of the Suicide Prevention Sector*

Thornton, L. E., Lamb, K. E. & Ball, K. (2016). Fast food restaurant locations according to socioeconomic disadvantage, urban-regional locality, and schools within Victoria, Australia. *SSM-POPULATION HEALTH*, 2 pp. 1-9. Available at: <https://doi:10.1016/j.ssmph.2015.12.001>

VCOSS (2023). *Mapping poverty in Victoria*.

Weaver, J.L. and Fasel, B.C. (2018) A Systematic Review of the Literature on the Relationships between Chronic Diseases and Food Insecurity. *Food and Nutrition Sciences*, **9**, 519-541.

Wilkinson, R., & Pickett, K. (2010). *The spirit level: Why equality is better for everyone*. Penguin UK.

Woodside, J.V. et al. (2023) 'Fruit and vegetable consumption as a preventative strategy for non-communicable diseases', *Proceedings of the Nutrition Society*. 2023/02/14 edn, 82(2), 186–199. Available at: <https://doi.org/10.1017/S0029665123002161>.

Ye, M. et al. (2013) Occupational Pesticide Exposures and Respiratory Health. *International Journal of Environmental Research and Public Health*, 10(12), 6442–6471. Available at: <https://doi.org/10.3390/ijerph10126442> .

Zhan, Y. and Chen, K.Z. (2021) Building resilient food system amidst COVID-19: Responses and lessons from China, *Agricultural Systems*, 190, 103102. Available at: <https://doi.org/10.1016/j.agsy.2021.103102>.