



Victorian pre-budget submission 2026-2027

Prepared by Sustain: The Australian Food Network

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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.

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.

Summary of Recommendations

Recommendation 1

Reverse the decision to absorb VicHealth into the Department of Health; keep VicHealth independent and increase its funding.

Recommendation 2

Develop and fund an integrated food system and food security strategy for Victoria with a range of associated elements and measures.

Recommendation 3

Develop a Food Systems and Food Security Fund for Victoria via hypothecated taxation i.e.:

- Extension of the existing Payroll Tax Surcharge
- 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
- Commercial and Industrial Property Tax
- Use Land Value Capture (LVC) mechanisms to capture the uplift in value of all residential properties within 1 km of community food infrastructure assets, such as community gardens and community orchards. Following the precedent set out in the Suburban Rail Loop and following earlier Victorian practice that helped finance essential infrastructure (Betterment Levies), establish a LVC mechanism in all existing and future suburban developments to fund a major increase in community food infrastructure.

Recommendation 4

Invest in municipal and public markets and community food infrastructure.

Recommendation 5

Fund a range of measures to improve healthy food access, including a school meals program in Victoria.

Recommendation 6

Fund a range of measures to support the transition to a Circular and Sustainable Food Economy, including a Centre for Regenerative Agriculture.

Recommendations

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

Recommendation 1: Keep VicHealth independent

In December last year the Victorian government announced that it was accepting the majority of the recommendations of the Silver Review, including the recommendation to effectively abolish VicHealth by its absorption into the Department of Health. This decision has been widely criticised by leading public health experts across Victoria and internationally. VicHealth's track record in health promotion and prevention is second to none. It was world-leading when it was established, inspiring the creation of similar health promotion foundations in several other countries. It remains world-leading today, guided by an innovative and ambitious strategic plan that, if fully implemented, will make an enormous difference to the health and wellbeing of Victorians, saving billions to the Victorian government's health expenditure. Its return on investment is exceptional, [with Federal government figures showing that there is a return of \\$14 for every dollar spent on prevention](#).

Axing VicHealth will make very little difference to the Victorian budget, given that it represents less than 0.04% of total expenditure. VicHealth represents exceptional value for money and we urge the Treasurer and the Victorian cabinet to pay heed to the words of leading public health experts as well as the former Chairs of VicHealth to reverse the decision to abolish VicHealth. Rather, we urge the Victorian cabinet to keep VicHealth independent and increase its funding, using the various revenue raising measures we have set out below. For further information, see Appendix B.

¹ <https://humanrights.gov.au/resource-hub/guides-for-impacted-individuals/guides-on-rights-and-freedoms/rights-and-freedoms/chart-australian-treaty-ratifications-may-2012-human-rights-your-fingertips-human>

Recommendation 2: 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
- **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**

An integrated food system and food security strategy for Victoria

We and others made the case for this in our submissions to two Victorian parliamentary inquiries held in 2024:

- [Food Security in Victoria](#) – Legal and Social Issues Committee, MLC
- [Securing Victoria's Food Supply](#) – Environment and Planning Committee, MLA

The Committees' reports included as primary recommendations a call on the Victorian government to establish a whole-of-state, whole-of-government and whole-of-system approach to food security in Victoria through the creation of a Victorian Food System and Food Security Strategy.

The reasons for these recommendations are documented in the forewords from the respective Chairs of both Committees as well as in the Committees' findings and the extensive evidence in the hundreds of submissions made to the inquiries. These reasons range from the immediate hardship and suffering that millions of Victorians are currently experiencing, compromising their capacity to feed themselves and their families well – or at all; to medium and longer term threats and challenges to our food security, such as loss of valuable farmland, declining viability of agriculture, accelerating climate change and growing geopolitical instability and uncertainty.

In short, the Victorian government has a responsibility to show leadership and take decisive action on these fundamental matters that impact every Victorian and future generations.

Recommendation 15 of the LSC Report was as follows:

'That the Victorian Government develop a Victorian Food Security Strategy focused on:

- transitioning the food security response from relief to resilience
- supporting a place-based, community-led response to food security
- establishing a food relief sector which can be scaled to deal with sudden shocks and crises.'

Recommendation 1 of the EPC Report was as follows:

'That the Victorian Government develop a whole-of-government Victorian Food System Strategy. The strategy must address the food system as a whole (including agriculture, processing, manufacturing, supply and consumption). It should be centred on access to adequate, nutritious food as a human right and a determinant of health.

The strategy should aim to:

- secure Victoria's supply of healthy, locally grown food, in the long-term
- strengthen the resilience of Victoria's food system to shocks and stressors by promoting diversity across the system, decentralising and localising supply chains
- promote regenerative and sustainable food production
- support Victorian farmers and food manufacturers to build profitable businesses and expand healthy food production

- map major food producing regions and protect all agricultural land from inappropriate development
- build food systems literacy across government departments and local government.

The strategy must also set measurable targets, clearly attribute responsibility for achieving these targets and include a transparent monitoring framework.'

The Government's response to both recommendations, published on 31st July 2025, stated that the recommendations to develop a Victorian Food System and Food Security Strategy is 'Under Review'. With the development of the National Food Security, [Feeding Australia](#), now significantly advanced; with the Tasmanian government launching a significantly expanded [Food Resilience Strategy \(2025-2031\)](#) and the ACT government implementing the [Canberra Region Local Food Strategy \(2024-2029\)](#), Victoria is being left behind. We urge the Victorian government to adopt the recommendations of both Committees and proceed with the participatory creation of a Victorian Food System and Food Security Strategy.

We also refer 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).

Recommendation 3: Create a Victorian Food System Fund via hypothecated taxation

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**
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.
3. **Commercial and Industrial Property Tax**
4. **Land Value Capture mechanisms**

We urge the Victorian government to adopt our recommendations for deployment of hypothecated taxation to address the social and economic harms caused by the supermarkets (and the fast-food industry) to create a substantial Victorian Food Systems and Food Security Fund.

Opportunities for action

- Identify the most appropriate mechanism for using hypothecated taxation to address the social harms of the supermarket.
- Explore opportunities to introduce a similar tax for the fast-food industry which contributes significantly to poor health and wellbeing outcomes and reduces economic diversity of local economies.
- Consult with health economists to understand the true costs of food insecurity for the Victorian economy as well as potential cost savings of preventative action.

Benefits

- Generates revenue to resource a Food Systems and Food Security Fund as part of a Victorian food systems strategy
- Develops a pool of funds to resource a grants program for councils and communities to respond to food insecurity at the local level.

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 resilience². It can create new jobs for thousands of Victorians³, reduce sick days⁴, and help children to learn more effectively on the foundation of a healthy, nutritious diet.⁵

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^{6,7}
 - Increasing the amount of vegetables, fruit, protein, and fibre in our diets, to lower the risk of preventable, chronic dietary-related disease^{8,9}
- Improved mental health and wellbeing through better nutrition, higher rates of active participation in society and work, as well as greater community connection¹⁰
- Reduced amounts of synthetic agricultural inputs such as pesticides that have well-established links to cancer, asthma, food intolerances, and several other health risks^{11, 12, 13, 14, 15, 16, 17}

² Food Systems Economic Commission (2024). The Economics of the Food System Transformation. Food System Economics Commission, Global Policy Report.

³ Farm to Plate (2021). Vermont Agriculture & Food System Plan 2021-2030.

⁴ 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.

⁵ 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.

⁶ 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.

⁷ 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.

⁸ National Institute of Health (2017). How dietary factors influence disease risk. US Department of Health and Human Services.

⁹ World Health Organization (n.d.). Healthy diet.

¹⁰ 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.

¹¹ 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 internationale du cancer*, 124(5), pp. 1206–1212.

¹² Searles Nielsen, S. et al. (2010) 'Childhood brain tumors, residential insecticide exposure, and pesticide metabolism genes', *Environmental Health Perspectives*, 118(1), pp. 144–149.

¹³ *Op cit.*

¹⁴ Barrett, J.R. (2010) 'Critical Confluence: Gene Variants, Insecticide Exposure May Increase Childhood Brain Tumor Risk', *Environmental Health Perspectives*, 118(1), p. A35.

¹⁵ 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.

¹⁶ 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.

¹⁷ *Op cit.*

- Mitigation of the worst-case climate change scenarios via emissions reduction, and climate resilience associated with a localised, agroecological food system^{18, 19, 20, 21}
- Improved epidemic resilience through a healthy localised food system^{22, 23, 24}

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 2024-5.²⁵

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:

- **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

¹⁸ Schulte, L.A. et al. (2022) 'Meeting global challenges with regenerative agriculture producing food and energy', *Nature Sustainability*, 5(5), pp. 384–388.

¹⁹ 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.

²⁰ 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.

²¹ 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.

²² Zhan, Y. and Chen, K.Z. (2021) 'Building resilient food system amidst COVID-19: Responses and lessons from China', *Agricultural Systems*, 190, p. 103102.

²³ 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.

²⁴ Foodprint Melbourne (2022), Report: The resilience of Melbourne's food system.

²⁵ <https://www.sro.vic.gov.au/payroll-tax-surcharges>

- 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 years, 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). Responding to public concern, [the Federal government announced a new 'crackdown on price gouging' by the major supermarkets](#), to come into effect from 1 July 2026.

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 major supermarkets**. The current general land tax rate that applies to commercial properties valued at higher than \$3 million is \$31,650 plus 2.65% of the value over \$3 million. This is a fraction over 1% of the property value up to \$3 million, with the higher tax rate of 2.65% for the value over \$3 million. We believe it would be appropriate **to double both these rates to 2%, and 5.3% respectively for Coles and Woolworths**. This could be achieved by amending existing Land Tax Legislation (2005)²⁰. We would also like to see a more transparent tax report to see which land tax category the supermarkets sit under to ensure that they are not able to minimize the amount of land tax paid, and if they are, that legislation is additionally amended to ensure they cannot engage in tax avoidance practices.

The funds raised could be used to support the development and implementation of the Victorian Food Security and Food System Strategy and Action Plan as well as complementary Local Food System Strategies and Action Plans developed by local governments throughout Victoria. Part of this funding could 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'.²⁶

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 major supermarkets 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. This came up repeatedly in the Federal Select Committee Inquiry into Supermarkets, with Chapter 6 of the report dedicated to this, and associated issues. Describing the relationship between property and market domination, Ritchies, an independent supermarket business in Victoria, observed that⁶:

...while supermarkets are governed by the Competition and Consumer Act 2010 (Competition Act) and the Food and Grocery Code of Conduct (Grocery Code), both of these instruments ignore the fact retail is intrinsically linked to property. Ritchies pointed out that the success or failure of a supermarket is largely determined by the quality of its property, and larger supermarket chains have enormous financial capacity which is used to outbid competitors for the best sites for new stores.

Having regard to other serious problems that the major supermarkets are causing in Victoria's food system, **we also argue for a 5% tax on the Capital Improved Value to be applied specifically to land banking holdings, rising by an additional 1% for every year that the major supermarket is subject to this land tax.**

Such a tax would also disincentivise the anti-competitive practice, deployed by the major supermarkets, of using **restrictive covenants in new developments** that inhibit healthier, often cheaper competitors from gaining retail space. As per the ACCC⁵:

Coles and Woolworths did engage in deliberate strategies designed to ensure they maintain exclusive access to prime sites, including terms in their leases which effectively prevent centre managers leasing space in centres to competing supermarkets. These restrictive provisions usually take the form of an outright prohibition on the centre owner introducing a second, or third, supermarket into the centre for a specified period (usually 10 years) or make provision for a sufficient financial penalty via rents which renders it commercially unviable for the centre owner to introduce a competing supermarket.

This demonstrates how the major supermarkets use their power to restrict competitors' access to land to further consolidate and expand already excessive market dominance. In doing so, they ensure that our food environments contain higher concentrations of processed, unhealthy food, and less fresh foods that small scale grocers and farmers markets provide. To counter the major supermarkets using land

²⁶ <https://www.sro.vic.gov.au/vacant-residential-land-tax>

restrictions to increase profit through further entrenchment of market domination, it is justifiable to increase the land tax rates they pay, both for land they own, and land to which these restrictive covenants apply.

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](#).

Commercial and Industrial Property Tax levies

The Victorian land transfer duty (stamp duty) has recently been replaced by the Commercial and Industrial Property Tax (CIPT) legislation for commercial properties²¹. The current rate as per 1st July 2024 is 1% of the land value at the time of purchase. We believe that this legislation could be amended to enforce a higher rate of CIPT on the major supermarkets and fast-food chains, to compensate for the negative externalities that they have on the health and wellbeing of Victorians and to finance healthier alternatives.

Property portfolios of the major supermarkets

Nationwide, Woolworths owns more than \$10.3 billion in property assets. This includes \$1.6 billion in development properties, and \$1.3 billion in freehold land and other properties¹⁶. Coles owns \$731 million, and \$151 million in those categories respectively¹⁷. Coles own 851 stores in Australia, 224 of which are located in Victoria (26.5%)¹⁸, and Woolworths own 1116, 272 of which are in this state (24%)¹⁹. While no data exists on how much land Coles and Woolworths own state by state that they are effectively land banking, it is reasonable to assume that it may follow similar lines to the retail outlet data. Taking these percentages, we can assume that of the \$2.9 billion in property developments and freehold land that Woolworths owns, nearly \$700 million is in Victoria, and for Coles, \$233 million.

It is unclear exactly how much land tax and stamp duty the major supermarkets have paid, and we believe more transparency is required in their financial reports to ensure that this data is publicly available. Coles notes that they paid \$7 million in property tax in 2023, whereas Woolworths fails to break down their tax contributions in their public reports sufficiently to observe how much land tax and stamp duty they have paid. Regardless, we believe it is appropriate to increase the land tax paid by the major supermarkets, as noted above, as well as the CIPT rates (formerly stamp duty) they are liable for to offset the negative externalities their practices cause.

Considering that the land value of supermarkets has been estimated in this report to exceed \$900 million in Victoria, a CIPT of 3% applied to all current holdings would equate to \$27 million per year for the major supermarkets alone. In addition to an amended land tax of 3%-5%, this would equate to \$54 - \$72 million per year. This amount could be directed towards the initiatives outlined above under the section '*Unhealthy food environments, morbidity, and health expenditure*'. This would have a substantial impact on fostering food security in this state, and consequently lead to a healthier, happier, and thriving Victorian population. This would lead to less government spending on healthcare and many other services that are currently stretched due to diet related illness, and economic disadvantage (of which current food prices are a major factor).

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 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.²⁷ 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’.²⁸ 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).

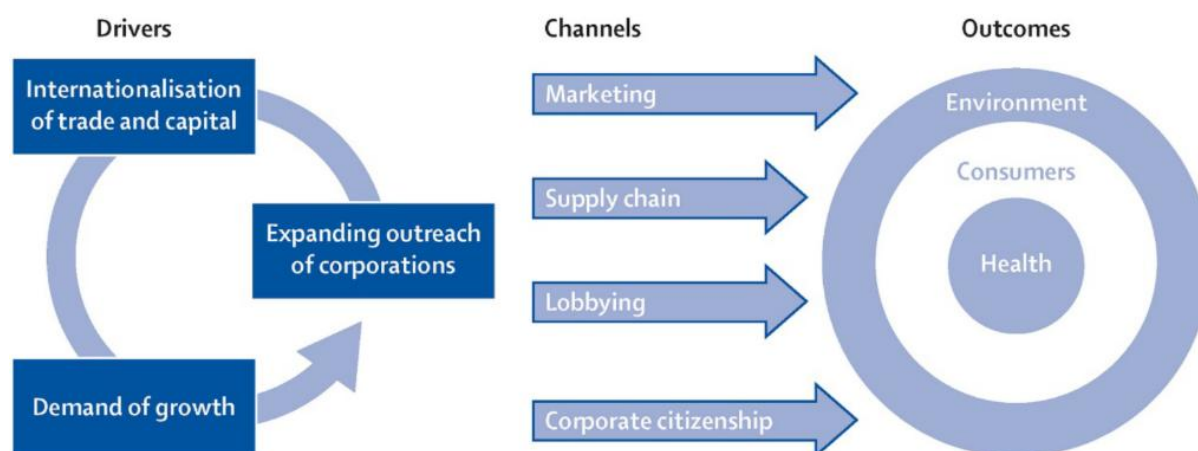


Figure 4: Commercial determinants of health. From Kickbusch I, Allen L, Franz C. The commercial determinants of health. *The Lancet Global Health*. 2016 Dec 1;4(12): e895-6. Republished with permission from the authors in Rose et al (2022).

²⁷ 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.

²⁸ 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.

Establish a land value capture mechanism to fund community infrastructure

Land value capture describes the mechanism by which increases in land value attributable to public and / or community investments can be captured and spent for the benefit of the public and community, typically through the funding of specific public infrastructure projects. Victoria has long experience with this process, which in earlier decades was known as ‘Betterment Levies’, in particular:

- The Melbourne City Loop (1980s): betterment levies sourced from special rates on properties in the Melbourne CBD and beyond whose land value increased as a result of the City Loop
- Doncaster Rail Line (1920s): A similar proposed use of betterment levies that was abandoned due to the 1930s Great Depression
- Municipal Levies (early 20th Century): Betterment Rates used by the local councils to fund tramway development and maintenance as well as redevelop old rail corridors

Similarly in the ACT the [Lease Variation Charge](#) has long been used to fund development improvements.

In 2016, Infrastructure Victoria published a paper titled ‘[Value Capture](#)’ which explored a range of options for Victoria from this financing mechanism. The key findings from that paper were as follows:

- To make the funding mix fairer, we can use some of the windfall gains from those that benefit to help pay for infrastructure.
- Value capture is unlikely to fully fund a project, but it can help contribute to some of the costs.
- In Victoria we use value capture funding now but there are opportunities to expand their use. These should be considered on a case-by-case basis.

- Value capture should not change project priorities.
- Action can be taken now to improve the use of value capture.

The key recommendations were:

- **Move towards greater use of value capture.** A range of options is available for increasing the use of value capture including expanding and using existing mechanisms more consistently.
- Take action to improve how value capture is used. Government should develop a clear value capture policy and pilot a value capture betterment levy on a major project
- As part of a value capture policy, a process should be developed for consistently assessing and applying value capture to projects on a case-by-case basis. This process should align with existing project planning, development and delivery processes.
- Careful design of value capture mechanisms such as land and betterment levies can improve the funding mix for major infrastructure projects. Deciding when to use and implement any value capture mechanism is important.
- Work with local councils and the Australian Government to ensure value capture approaches meet local infrastructure needs. Approaches should also reflect that state infrastructure investment

(highlight added).

Similarly, Prosper Australia in [their historical review of Land Value Capture](#) comment that:

Land Value Capture (LVC) is an innovative and efficient means of funding the infrastructure that our cities need, by harnessing the very value that same infrastructure creates. LVC has been used both in Australia and around the world to fund urban infrastructure and boost urban liveability.

The Victorian government [announced in December 2025](#) that ‘value capture will be applied to help fund the Suburban Rail Loop’. In its statement, the Government said that:

The Suburban Rail Loop value capture mechanism will include [land tax](#), [windfall gains tax](#), [Infrastructure Contributions Plans levy](#), [congestion levy](#) and state-initiated development.

As noted earlier, there is a need to invest in community food infrastructure to meet the needs and aspirations of Victorians for a food secure future, as well as for expanded access to healthy, nutritious and affordable food. Community gardens, community orchards and urban farms are all excellent examples of such infrastructure. [Literature and studies](#) show the land and property values increase within 1 km of such public facilities (also including public parks and other forms of urban greenspace). The effect is more pronounced in lower-income suburbs and neighbourhoods and also depends on the garden and urban space being well maintained and cared for. Depending on proximity to the community infrastructure, the increase in land and property values ranges from 2.5% to 11%.

Given the long-term historical increase in land and property values across Australia, it is reasonable to assume that such an appreciation in land values has occurred across Melbourne and other urban centres in residences that have proximity to community gardens and public parks. With Melbourne’s and

Victoria's population continuing to increase rapidly and with new suburbs being developed, we recommend that the Victorian government work with local governments to conduct an audit all properties within 1 km of a community garden and / or public park, and assess the increase in their land values over a five year period compared with properties outside that 1 km radius. We further recommend that the Victorian government work with local governments to establish a land value capture mechanism (such as betterment rates) to be levied on properties within that 1 km radius of a community garden or public park that are not owner-occupied. Such a mechanism could raise many millions within a relatively short time frame, with the proceeds available for investment in existing and new community infrastructure through a process co-managed by local governments and established community food organisations and networks. This would complement and augment the Victorian Food System Fund.

Recommendation 4: Invest in municipal and public markets and community food infrastructure

We believe that the importance of municipal markets has been overlooked in considerations about food security, which significant implications as noted above. Municipal markets and the Melbourne wholesale market should be regarded as critical food system infrastructure and prioritised as such in the state planning framework, local planning schemes and in neighbourhood precinct planning processes. As part of this, the food system resilience and its importance for health and wellbeing must be integrated into planning processes and thinking, alongside housing, transport, health and sanitation infrastructure.

The Victorian Government is, to Sustain's knowledge, in the unique position of owning the only publicly owned wholesale market in Australia. State government oversight of Victoria's food supply also falls within the remit of the *Melbourne Market Authority Act 1977* whose objects are to:

1. provide a commercially viable wholesale facility for the efficient distribution of fresh produce;
2. optimise returns on land and assets controlled and managed by the Authority; and
3. ensure **a fair and competitive environment for the wholesale trading of produce.**

State and local government planning frameworks should be used to protect the competitiveness of the wholesale market by creating incentives to support municipal markets and independent greengrocers that depend on them.

Case study – Gleadell Street Market

Gleadell Street Market (GSM) has been running for 150 years and is part of the cultural and economic fabric of the City of Yarra, which owns and operates the market. Running Saturdays from 7am to 1pm, the market features an array of stallholders selling seasonal produce, bread, seafood, meat, dairy, condiments and other artisan products. Stallholders are culturally and linguistically diverse, thereby reflecting the broader Victorian community. In a fresh produce price analysis of 38 food retailers in inner metropolitan Melbourne, GSM was the third most affordable source of fresh produce, following Queen Victoria Market (most affordable) and a cultural grocer (second most affordable). A fresh produce basket at GSM cost \$509 compared to \$600 at the closest major supermarket. Savvy shoppers know fresh produce is even more affordable at the end of the market when stallholders offer "dollar bags." This low infrastructure, pop-up municipal market format is a tested model that benefits low-income households but is enjoyed by everyone by enlivening the built environment and offering affordable access to good food outside the retail monoculture of the supermarket system.

Opportunities for action

- Develop planning incentives for the establishment of new greengrocers in brownfield sites.
- Explore opportunities to replicate the low infrastructure, pop-up format of the Gleadell Street Market (case study above) in low-income neighbourhoods poorly provisioned by affordable, fresh food options.
- Create fiscal incentives to enable existing greengrocers to stay open into the late evening to assist them in competing with supermarket convenience.

- Prioritise the establishment of new municipal markets in greenfield developments, particularly on Melbourne's growth corridors where they can support local producers.
- Advocate to the Commonwealth government that wholesale markets and municipal and independent markets are considered.

Benefits

- A more resilient food system for Victoria
- Better access to affordable and culturally diverse produce
- More economic diverse neighbourhoods that reflect cultural, social and economic diversity of Victoria's communities
- Supports local food economy
- Healthier neighbourhoods and communities
- A stronger agricultural sector with diversified opportunities for market access

Invest in community food infrastructure

Community food infrastructure (CFI) encompasses a broad range of community-oriented food infrastructure from production to disposal. CFI is also sometimes described as culinary infrastructure, public food infrastructure, community food assets, and collective infrastructures of care. CFI can include community gardens, urban farms, communal bakeries, food co-ops, food hubs, community fridges, government-owned commercial kitchens or warehouse space, public pantries, municipal or community markets, public eating spaces or community composting hubs. CFI embeds food as a public good by providing vital urban infrastructure for communities to grow, prepare, access, share and celebrate food in non-market contexts.

CFI also support the exchange of cultural and intergenerational food knowledge and strengthen social cohesion. During the pandemic, CFI played an important role in enabling community organisations and local councils to collaborate in responding to the needs of vulnerable communities. Outside of crisis, CFI places an important role in social cohesion by providing a space for people to come together around food.

Despite the importance of CFI for supporting more equitable, sustainable, resilient and healthier community food systems, CFI has been overlooked in urban policy and planning.

Embedding community food infrastructure in public and social housing estates provides an opportunity to support food security at a local level. Some public housing estates have established resident-led food relief initiatives such as the Park Towers Food Pantry. These would benefit from more concrete support as they often lack DGR status and are not eligible for grants. A cluster of community food infrastructure in the Fitzroy and Carlton public housing estates (see case study below) demonstrate the multifunctional benefits. However, access to community kitchens for food relief and social connection activities are often hindered by excessive bureaucratic hurdles from the relevant state government departments.

Case study – Fitzroy/Carlton public housing estates

The Fitzroy Community Food Centre run by Cultivating Community at the Atherton Gardens public housing estate has emerged into a unique community food system ecosystem supporting the local community to share and access affordable food. A commercial kitchen at the bottom of the building is used for **free weekly “Meet & Eat” lunches** open to all where people can share meal preparation or simply enjoy the lunch. **Integration of social support services** such as Fitzroy Learning Network and CoHealth into the lunch program provides other assistance where needed. The **commercial kitchen** provides space for **cooking programs and clubs**, including an **after-school cooking program for children**. Public housing residents also use the kitchen to **host cultural celebrations** such as Eid. The Atherton Gardens community garden provides a place for estate residents to grow edible plants that reflect the community’s culinary diversity.

Cultivating Community facilitates the High Rise Community Bakery, also located at Atherton Gardens, a **local baking group and social enterprise** that enables community members to bake affordable, nutritious and delicious bread, build social connection and foster a space for knowledge sharing. The bread is sold on a ‘pay-as-you-feel’ sliding scale at **Community Grocer**. A separate initiative operating within the same space, Community Grocer is a low-cost market selling fresh produce at affordable prices in the communal spaces of both the Atherton Gardens and Carlton public housing estates. Just up to the road at a nearby public housing estate is the **Carlton Kitchen Library** where residents can borrow cooking items at no cost. This encourages cooking at home, supports community celebrations and contributes to a circular economy by giving unwanted appliances new life and keeping them out of landfill.

All within short walking distance of each other, this cluster of community gardens, community kitchen, community bakery, kitchen library and social grocery markets highlights the multifunctional benefits of **mobilising the infrastructure and spaces within public housing estates**. It offers a best-practice example of how community food infrastructure supports communities to prepare, distribute, share and celebrate food together, often at no cost or at subsidised prices. Because many of the events are open to the broader community, they also serve to break down barriers created by socio-economic disparity.

Opportunities for action

- Prioritise access to community food infrastructure in neighbourhood precinct planning processes.
- Nominate community food infrastructure as a key community infrastructure asset by the Victorian Planning Authority.
- Integrate community food infrastructure into state government-managed assets and spaces, particularly public/community/social housing developments, via the Community Infrastructure Loans Scheme, community infrastructure levies and developer contribution schemes. The Victorian Government’s Level Crossing Removal Project offers the potential for new open spaces suited to the integration of community food infrastructure, alongside dog parks, skateboard parks and other new public infrastructure.

Benefits

- Enables cost-sharing for community food infrastructure with developers benefiting from urban development
- Facilitates government-community partnerships to address food insecurity at a local level.
- Contributes to more convivial and socially inclusive communities that reflects the diversity of the Victorian broader community.

Recommendation 5: Improve Healthy Food Access

We acknowledge and support the funding from the Department of Families, Fairness and Housing for community food relief as well as coordination grants, together totalling \$9 mn in the current financial year. We also acknowledge and support the funding made available to Foodbank Victoria for the school breakfast program.

These are good foundations on which to build. Specifically, we recommend that the Victorian 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, learning from experience overseas as well as the successful pilot developed by [School Food Matters](#) in Tasmania
- 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

Federal funding

To be able to fully implement all these recommendations, 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.

Recommendation 6: Invest in a Circular and Regeneration Food Economy

The food and agriculture system are currently major drivers of anthropogenic climate change as well as biodiversity loss and unsustainable practices more generally. Yet the system can also be a powerful force for sustainable and regenerative practices.

We recommend that the Victorian 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
- Funds the establishment of a **Centre for Regenerative Agriculture** to support farmers make the transition to sustainable and regenerative forms of production

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)
- 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).
- 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>.
- 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.](https://www.sustain.org.au/pandemic-gardening-survey-report)
- 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 (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>
- 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. Available at: <https://www.ers.usda.gov/publications/pub-details?pubid=84466>

- 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>.
- 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>.
- 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>.
- 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>.
- 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>
- 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>.
- 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.
- 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>.

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.

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>.

Appendices

Appendix A: Sustain Response to Question on Notice from the Environment and Planning Committee Inquiry into Securing Victoria's Food Supply

QUESTION TAKEN ON NOTICE

David HODGETT: It is a bit separate to this, but I was fascinated when you were talking, Nick, about some of the benefits of improving food. You gave an example of \$182 million. I would be interested if you have done any work – and you can take it on notice if you like – around changing behaviour. I know I should probably eat better or drink less or exercise more, and doctors will tell you they keep telling that to their patients, but how do we actually change human behaviour? I just wonder if you have done any work around that, even if you want to take that on notice.

Nick ROSE: We can speak to it a little bit, but it might be good to take it on notice and get back to you with some actual references. But yes, it is critical, because that is ultimately what we are talking about here, a cultural change, if we are actually interested in a healthy Victorian population, which I think we should be. We have grown up in the last 50 or 60 years in a convenience culture, from TV meals through to fast food and now to Uber apps. Everything is on notice, and that is what is marketed and that it is what is promoted. As anyone knows that goes into a supermarket and into the aisles, what is on discount, what is on special, what is in line of sight and what is near the check-out is not fruit and veg. So yes, it is a huge challenge. That is why we say, and Kelly mentioned this, that there is great value in changing what people experience when they walk around their streets and their suburbs, seeing what used to be commonplace, which was veggie gardens and fruit actually growing – the living tree with fruit, the living veggie patch with herbs.

ADDITIONAL QUESTIONS FROM THE COMMITTEE

Statewide food systems planning

1. What do you envisage a statewide food system and security strategy encompassing?
2. What types of initiatives would you like to see included in a strategy?
3. Why is it important that local governments get involved in food system strategy?
4. How do you envision protections for agricultural lands featuring in a statewide strategy?

1. What do you envisage a statewide food system and security strategy encompassing?

The aim of a Victorian food system and food security strategy should be to provide effective governance and coordination of Victoria's food system to ensure its integrity and healthy functioning for current and future generations, guided by a shared vision and key principles.

Key components and principles

These should include:

- **Participatory development**, foregrounding the perspectives of First Nations communities as well as those with lived experience of food insecurity
- **Whole-of-government and whole-of-system collaborative governance and coordination mechanism** (e.g. a Victorian Food Systems Committee) to guide implementation
- **Human and ecological health** as a core priority and guiding objective
- A **rights-based approach**, committing to the progressive realisation of the human right to good food for all Victorians
- A focus on food system **localisation and decentralisation** to strengthen resilience
- A focus on **regenerative and sustainable agriculture** to adapt to and mitigate the impacts of accelerating climate change as well as to reduce dependency on imported inputs
- **Mapping and auditing the Victorian food system and supply chains** to identify key vulnerabilities, gaps and inefficiencies
- A **supportive state planning framework** that prioritises food system considerations and public health (including production, distribution and sale of healthy food) as well as **protects vital farmland including in peri-urban areas**
- **Clear, measurable targets** with appropriate indicators and **regular monitoring and evaluation** to track progress
- **Ensure alignment with other key policy portfolios and key strategies** to ensure coherence across government (e.g. First Nations Treaty, environment and climate change, health, transport, infrastructure, regional development)

A good starting point for the Committee is [*Towards a Healthy, Regenerative and Equitable Food System in Victoria: A Consensus Statement*](#).¹ Developed in 2021 by a collective of cross-sector organisations under the facilitation of VicHealth and launched in June 2022, the Consensus Statement sets out the following vision for Victoria's food system:

"An equitable, regenerative, prosperous and resilient food system that ensures access to healthy and culturally appropriate food for all Victorians; a system that values nourishment, fairness, dignity, democracy, participation, inclusivity and stewardship of the natural environment."

The Consensus Statement also articulates **a set of seven principles to guide action by the Victorian government** as it engages with this vital area of public policy, namely:

- *Uphold food as a basic human right*
- *Value inclusion and self-determination so that historically marginalised and disadvantaged groups participate in decisions and activities to reshape the food system*
- *Provide healthy foods within planetary boundaries, focusing on diverse, nutritious and minimally processed foods*
- *Strengthen local and regional food economies, fostering social connection, diversification and resilience*
- *Cultivate food literacy in the broader context of eco-literacy*
- *Promote fair incomes and working practices for farmers and food workers*
- *Celebrate the traditional food practices of Victoria's multiple ethnicities and diverse communities*

To these principles we would add the following:

- *Uphold the aspirations of Victoria's First Nations to realise their aspirations for food sovereignty and connection to Country through the recovery of cultural food knowledge, plants and practices.*

Leverage points for effective action

The Consensus Statement **set out ten leverage points** that can **serve as a roadmap for the Victorian government** in taking the actions necessary to realise the Statement's vision. These leverage points are as follows:

1. Legislate the right to food to create an enabling policy environment.
2. Establish a whole-of-government Food Systems Committee to oversee the participatory development and implementation of a Victorian Food System Strategy and Investment Plan.
3. Establish a comprehensive performance measurement and monitoring framework for Victoria's food system in the State of the Environment Report.
4. Support the transition to regenerative farming and agroecological solutions.
5. Create a Local Food Investment Fund to strengthen local and regional food systems.
6. Support Victorian farmers and food businesses through mandatory public sector food procurement policies.
7. Invest in universal food systems literacy for all Victorian school students.
8. Mandate and resource the participatory development of local government community food system strategies through amending the *Public Health and Wellbeing Act 2008*.
9. Amend the Victorian Planning Provisions to include health and environmental promotion as key considerations in planning decisions.
10. Develop a coordinated and collaborative food relief sector that prioritises dignified access to fresh and healthy food.

These 10 leverage points provide a good indication of the **scope for a Victorian Food Systems and Food Security Strategy. Coordination and governance (Leverage Point 2) are critical and must be adequately resourced by the State government.**

The need for a participatory, whole-of-system approach

The Committee will note that Leverage Point 2 speaks of the ‘**participatory development and implementation of a Victorian Food System Strategy and Investment Plan**’. This commitment to participatory policy making and wide public consultation is vital to ensure that the Strategy reflects the needs and priorities of Victorian communities as well as their trust and confidence in its purpose and aims, as they will need to be involved in its implementation for it to be successful.

A **participatory, collaborative and inclusive approach has been widely followed** in the creation and implementation of food system strategies, policies and plans, both in Victoria and internationally. Sustain has supported the community consultation, development and/or implementation of several food system strategies at the local government level in Victoria:

- [City of Melbourne Food Policy 2024-2034 \(endorsed 4 June 2024\)](#)
- [Community Food Strategy 2018-2026](#) (Cardinia Shire)
- [Food System Strategy 2020-2030](#) (Greater Bendigo)
- [Food Economy and Agroecology Strategy 2022-2028](#) (Mornington Peninsula Shire)
- [Urban Food Strategy 2023-2027](#) (Banyule)
- [Food System Strategy 2017-2024](#) (Merri-Bek – [now consulting on an extension to 2027](#))

These and other examples demonstrate the need for participatory approaches to the development of food systems and food security strategies and plans.

In addition to participation and inclusion, the complexity of food system issues requires a coordinated, whole-of-system approach. The Federal House Standing Committee on Agriculture’ 2023 report, [Australian Food Story: Feeding the Nation and Beyond](#), made several recommendations that, in our view, provide guidance to the Committee in terms of what a Victorian Food Systems and Food Security Strategy should encompass, including the following:

- Expand urban agriculture, including to develop skills and encourage careers in agriculture (Rec.10)
- Protect agricultural land from urban sprawl and non-agricultural uses (Rec. 13)
- Develop a Food Supply Chain Map, identifying key points of vulnerability (Rec.14)
- Develop a transport resilience plan focused on food security (Rec.15)
- Develop measures to eliminate food waste, including through improved data sharing across the supply chain and establishing regional food hubs (Rec.18)
- Develop and fund a research program focused on the development of a circular food economy (Rec.22)

- Develop and fund long-term research, development and extension to promote sustainable agriculture (Rec.25)
- Conduct surveys of household food insecurity every three years using the USDA Household Food Security Survey Module (Rec.29)
- Develop a school curriculum for food and nutrition education including basic cooking skills (Rec.30)

The NSW Environment and Planning Committee's 2022 report on its Inquiry into food production and supply similarly recommends the development of a comprehensive Food System Plan for NSW that addresses the food system as a whole, including:

- strategies to address food insecurity
- promoting equitable access to nutritious food
- consideration of food production, including urban agriculture
- any required changes to planning and development frameworks
- points of integration with local government and service providers

While state government food system planning and strategy development is in its nascent stages in Australia, it is well advanced in the United States and elsewhere. In its [Overview of State and Regional Food System Plans and Charters](#) (2021), Michigan State University's Centre for Regional Food Systems found that 'nearly 60% of US states have an active food systems plan or one under development.'

Best-practice examples at the state level in the US include the [Vermont Farm to Plate Plan 2009-2030](#). However there are a range of other examples at the state and national level from which to benchmark a best-practice approach:

- [Colorado Blueprint of Agriculture and Food 2017](#)
- [Food Policy for Canada 2019](#)
- [UK National Food Strategy 2021](#)
- [Alaska Food Strategy Taskforce / Statewide Action Plan 2022](#)
- [Good Food Nation Act Scotland 2022](#)

2. What types of initiatives would you like to see included in a strategy?

We strongly encourage the State government to focus strategic actions towards systemic and structural changes that shape the food and commercial environments in which Victorians live, eat and make decisions about food. Research has demonstrated that policies and strategies targeting (for example) food environments and the commercial determinants of health are far more effective than policies focused on individual behaviour change.² It is also noteworthy that public health policies that have had the greatest positive impacts on population health are those led and coordinated by government with little to no external influence from food and beverage industries.³

We would like to see several high-level as well as specific initiatives included in a statewide food system and security strategy. For example, the 10 leverage points in the aforementioned Consensus Statement as well as the roadmap (page 59) and recommendations in Sustain's 2022 *Growing Edible Cities and Towns* report (commissioned by Agriculture Victoria (see Appendix) offer high-level recommendations for changes needed to the state government planning framework and other critical needs for transitioning to a more resilient, sustainable and healthy food system. In addition to the recommendations in the documents above, we would like to see the following initiatives in a food system and security strategy.

Type of initiative	Recommendation	Rationale
First principles		
First Nations sovereignty	Foreground First Nations knowledge and culture in the food system	To ensure that food system investments and initiatives support connection to Country and economic self-determination for all Aboriginal Victorians.
The human right to food	Legislate food as a basic human right	Provide the strongest possible legal and moral grounding for the Strategy in core principles of international human rights law
Participatory policy approaches	Establish a whole-of-government Food Systems Committee to oversee the participatory development and implementation of a Victorian Food System Strategy and Investment Plan.	To ensure the Strategy reflects the needs and priorities of Victorian communities as well as their trust and confidence in its purpose and aims.
Effective resourcing and investment		
Fiscal innovation and taxation	Create an Ultra-Processed Food and Beverage Act (similar to the Victorian Tobacco Act 1987)	To reduce the growing health harms from these products and to establish a significant fund from which preventative health and food system initiatives can be financed for the long-term. ⁴
Fiscal innovation and taxation	Identify community food infrastructure (facilities for communal growing, cooking, eating) as part of the Essential Works List and open space facilities.	To ensure infrastructure needed for community food system resilience can be funded through existing fiscal mechanisms such as developer contribution schemes (including public open space contributions, developer infrastructure levy and community infrastructure levy).

		To create a planning framework that empowers local government to invest in community food system priorities (including food system localisation and security as well as social cohesion and ecological wellbeing).
Community food system investment	Develop and implement a community food projects scheme (akin to Agriculture Victoria's Small-Scale and Craft grants program).	<p>To address under-resourcing in the Victorian community food sector.</p> <p>To ensure local communities are supported to ensure the food supply needs are met at the local level.</p> <p>A useful model is the USDA's Community Food Projects Competitive Grants Program.</p>
Planning reform		
Community food system planning	<p>Embed food system considerations into neighbourhood precinct planning.</p> <p>Incorporate access to greengrocers and other independent food outlets as key liveability indicators in precinct planning.</p>	<p>To ensure precinct planning frameworks and processes encourage economic diversity of food retailing and access.</p> <p>To embed, measure and monitor food retailing diversity in strategic planning for 20-minute neighbourhoods.</p>
Planning reform	<p>Mandate that public health and other food system considerations are incorporated in the state planning framework and must be considered in local planning schemes and decisions.</p> <p>Implement planning controls on new convenience, fast food and takeaway outlets, particularly</p>	<p>To ensure that planning decisions enhance public health and reflect community food system priorities.</p> <p>To tackle the dominance of unhealthy food in the urban landscape and mitigate the impacts on young people's food choices and their health now and into the future.</p>

	near schools and early childhood education.	
Planning reform	Integrate community food infrastructure (communal spaces for growing, cooking and eating) in all new social and public housing.	To ensure vulnerable and/or low-income households have good food access. A best-practice example of a thriving food infrastructure cluster is the Atherton Gardens Public Housing Estate (Fitzroy) which includes a community kitchen, community garden, kitchen equipment library, community bakery and low-cost weekly community market.
Urban agriculture	Recognise and support urban agriculture as a legitimate land use in the state government planning framework.	To support the diversification of Victoria's food supply. See Sustain's 2022 report Growing Edible Cities and Towns for a detailed roadmap to support the Victorian urban agriculture sector (Appendix 1).
Economic development		
Regional development	Support cooperative models for food processing, distribution and retailing through public investment in shared food processing infrastructure in rural and regional areas (including small-scale abattoirs, storage/coolrooms, food hubs, commercial kitchens etc).	<p>To build greater economic diversity in the Victorian food economy.</p> <p>To revitalise regional food economies and strengthen supply chain connections.</p> <p>To strengthen the financial viability of smaller-scale food businesses in urban and regional areas.</p> <p>To encourage cross-sectoral and B2B collaboration in the Victorian food system.</p>

Food system diversification	<p>Provide incentives for greengrocers and independent retailers to have extended hours (e.g. stay open till 7pm).</p> <p>Incentivise empty commercial real estate to be used by independent food start-ups.</p> <p>Use precinct neighbourhood planning schemes to incentivise mobile and/or pop-up fresh produce markets, particularly in outer suburbs and neighbourhoods with empty high street shops.</p>	<p>To create more economic diversity in the Victorian food retailing landscape.</p> <p>To ensure diverse market channels for Victorian food producers and makers.</p> <p>To support urban and economic revitalisation at the local level.</p> <p>To improve and diversify access to healthy and fresh produce in outer suburbs, particularly where unhealthy food outlets are over-represented and/or healthy food outlets are under-represented.</p> <p>To retain existing independent food retailers by supporting them to compete with the supermarket duopoly.</p>
Public procurement processes	<p>Work with procurement managers across the public service to map current arrangements and identify opportunities to progressively support Victorian food producers.</p>	<p>To ensure diverse market channels for Victorian food producers and makers.</p> <p>To enhance the viability, sustainability and resilience of the Victorian food economy.</p>
Food system capacity building, education and training		
Capacity building in government	<p>Invest in food systems professional development programs across local and state government departments.</p>	<p>To support government departments and policymakers with the skills and knowledge needed for effective food systems policy and action.</p>
Secondary schools	<p>Resume the Secondary Schools Agriculture Fund and incorporate a focus on urban agriculture.</p>	<p>To strengthen the urban agriculture sector while building agricultural literacy in young people across urban and regional settings.</p>

Vocational training	Embed food systems knowledge in relevant free TAFE courses, e.g. cookery, hospitality, kitchen management, agriculture, horticulture, etc.	<p>To provide the foundations for a workforce that can support the transition to a secure, sustainable and healthy food system.</p> <p>To ensure vocational graduates working in food-related industries have the skills and knowledge to meet current and future food system challenges.</p>
Higher education	Work with the higher education sector to embed food systems thinking into planning curriculum.	To ensure planning professionals are well equipped to understand the food systems implications of planning processes and decisions.
Adult education	Invest in the urban agriculture training and employment pathways.	To support the development of new and non-traditional entries into the agricultural sector.
	Develop farmer incubator programs for young and new farmers.	<p><i>Examples:</i></p> <p>Sustain's First Nations urban agriculture internship program.</p>

3. Why is it important that local governments get involved in food system strategy?

There are many reasons for local government to be involved in food system strategy development and implementation, including their obligations to develop Municipal Public Health and Wellbeing Plans every four years and to give consideration to climate change at a local level. Recent research on local government food systems governance has articulated other reasons why local governments can and do play an active role in food system strategy:⁵

- their responsibility for policy areas that impact on, and are impacted by, food systems, including land use planning, transport, sustainability, waste management and community services;
- their management of public land which can be made available for community and / or commercial food growing as well as public assets and facilities (e.g. neighbourhood houses, commercial kitchens, storage facilities) which can support community-led food programs, social enterprises and initiatives;
- their 'unique insights into local and community needs, enabling them to respond with targeted, place-based measures';
- their role in facilitating 'community participation to support deliberative forms of food system governance unavailable at state and federal levels.'

A survey of 64 local governments in Victoria and NSW conducted in 2021 found that many local governments are already engaged in a range of activities including food waste minimisation, social and cultural events and education programs, community gardening/verge planting, Meals on Wheels programs and, increasingly, food relief initiatives.⁶ Much less frequent were actions or programs supporting urban and peri-urban agriculture, sustainable and regenerative agriculture and market gardening (e.g. through the provision of land).

While not all councils have food system strategies, many (in addition to those mentioned above) have recently supported the establishment of food system coalitions or networks at the local level to ensure strong partnerships between council and the local community. These include:

- [Local Food Coalition 2023-2025](#) (City of Ballarat)
- [Local Food Network 2024-2026](#) (Golden Plains Shire Council)
- [Food Systems Roadmap 2024](#) (Central Goldfields Shire Council)
- [Food Systems Collective 2024](#) (City of Melton)

Enablers of local government involvement in food systems work

A significant enabler (and funder) of this work has been VicHealth through its [Local Government Partnership and Modules flagship](#). Other key enablers of local government engagement in food system strategy development and implementation include:

- strong internal support and leadership (either from executive or elected officials);
- the creation and funding of dedicated food system or food security officer positions;
- strong local and regional partnerships and collaborations; and
- access to funding (state or federal).

Barriers to effective state government action

A recent study regarding the barriers to local government implementation of food systems initiatives identified the following issues: lack of human resources (81%), insufficient funding (70%) and organisational priorities (53%).⁷ In particular, the authors offered these reflections on short-term, project-based funding as a barrier to local government food systems action:

*[Local governments] achieve policy adoption and implementation of activities but [often] cannot demonstrate positive impact or sustain programs of work prior to funding ceasing. **Dedicated long-term investment for food system work is essential at local, state and federal levels, including resourcing for governance processes** (e.g. data collection, community involvement and policy development) in addition to project implementation and evaluation.*

Short-term funding is not the appropriate financing mechanism when the goal is to achieve systemic change and impact. Funding must be for the long-term – such as the Vermont Farm to Plate Plan, now entering its 15th year and has at least another six still to run.

Other research focused on food system strategy and policy development and implementation in local government in Victoria has identified a range on systemic factors and barriers to effective local government action on food systems.^{8 9 10 11 12}

Organisational factors impeding local government action

- Lack of commitment from senior leadership (this is linked to the lack of policy mandate at state and federal level mentioned below);
- Limited organisational capacity (funding, staffing and expertise);
- An institutional culture of risk-aversion;
- Lack of engagement in food systems outside community and health directorates;
- Loss of specialised knowledge through poor staff retention on food system initiatives (often resulting to short-term project funding);
- An overestimation by state government partners of local government's capacity to address systemic drivers of food system issues.

Policy barriers that create a poor policy mandate for action include:

- Lack of direction from, and coherence between, state and federal law and policy relevant to food systems, including a state planning framework that acts as a major legislative barrier to improving healthy food environments;
- Lack of political will and institutional interest to engage with evidence on a range of food systems issues;
- Lack of state funding supporting a whole-of-food-system approach, with most funding directed towards short-term projects and specific topics rather than core functions such as hiring staff (in contrast to the Vermont Agriculture and Food System Strategic Plan 2021-2030, a statewide food system strategy supported since 2009 by 20 years of dedicated funding and backed by state government legislation);
- Limited ability of local government to increase its revenue streams to effectively resource food system policy initiatives;
- Lack of jurisdiction over taxation, advertising regulation or welfare policy;
- An overemphasis on individual behaviour that devolves responsibility to consumers while ignoring corporate actors in shaping food system behaviour;
- Unequal power dynamics and policy influence between corporate and community actors in the food system;
- Onerous reporting and inflexible "approach to community, management, and accountability structures" in intergovernmental partnerships (state-local) on food system issues;

- An absence of systematic, comprehensive monitoring of food system issues at state and federal levels, impacting data available to local governments to plan, implement and evaluate their activities.

Recommendations to support local government involvement in food systems strategies

While the Victorian Health and Wellbeing Plan 2023-2027 mentions food systems as a challenge and consideration for health and wellbeing, it presents several limitations for action. Although there are targeted strategies identified under each of the Plan's ten priorities, there is no food system strategy at the state or local government level. This provides a weak mandate for investment and action.

Research supports the following recommendations for state government action to support local governments to engage more deeply and effectively in food system strategy development, implementation and governance:¹³

- A statewide, comprehensive food system and food security plan that set objectives and targets on priority food system issues.
- An explicit legislative and / or policy mandate for food systems [to] empower local governments to develop and implement food system policies and programs that promote positive health, environmental, social and economic outcomes for the community.
- Amendment of state government planning frameworks to enable local governments to encourage opening fresh food retail outlets and restrict new fast-food restaurants.

As regards the **critical issue of resourcing and capacity for local government and community organisations to engage in food system strategy development and implementation**, a useful model for the Committee and the Victorian government to consider is the recently launched [Regional Food System Partnerships grants program](#) of the US Department of Agriculture. This creates two streams of grants: 24-month Planning and Design Projects (\$USD100,000 - \$USD250,000) and 36-month Implementation and Expansion Projects (\$USD250,000 - \$USD1,000,000). Eligible entities include local governments, food councils / networks, not-for-profit organisations, First Nations organisations and producer cooperatives.

4. How do you envision protections for agricultural lands featuring in a statewide strategy?

There are several examples for the protection of agricultural land that could be embedded in a statewide food system strategy.

The [Ontario Greenbelt Plan \(2017\)](#) aims to protect the province's most important and productive farmland through the following:

- Protecting against the loss and fragmentation of the agricultural land base and supporting agriculture as the predominant land use;
- Providing permanent protection to the natural heritage and water resource systems that sustain ecological and human health;
- Creating an environmental framework for urbanisation in south-central Ontario;

- Supporting a diverse range of economic and social activities associated with rural communities, agriculture, tourism, recreation and resource uses; and
- Building resilience to and mitigates climate change.

The [British Columbia Agricultural Land Reserve](#) aims to

- preserve the agricultural land reserve;
- encourage farming of land within the agricultural land reserve in collaboration with other communities of interest;
- encourage local governments, First Nations, the government and its agents to enable and accommodate farm use of land within the agricultural land reserve and uses compatible with agriculture in their plans, bylaws and policies.

The City of Boston planning reform ([Article 89](#)) is an exemplar planning framework that:

- establishes zoning regulations for the operation of urban agriculture activities;
- provides standards for the siting, design, maintenance and modification of Urban Agriculture activities that address public safety and minimize impacts on residents and historic resources in the City of Boston.

With regard to specific changes to the planning framework, we defer to the expertise of planning expert Linda Martin-Chew and the recommendations in her own submission to the Inquiry:

1. Commit to land use planning regulation to prioritise peri-urban agriculture over other land uses. Apply the benchmarking principles (relating to food production, processing, distribution and waste management) in any review of planning regulation because they are specifically aimed at supporting a local, sustainable food system.
2. Government intervention is required to reduce the rate of conversion of agricultural land to residential use. Bring forward Action 16 from the Planning for Melbourne's Green Wedges and Agricultural Land Action Plan to require parliamentary ratification to subdivide land below the minimum lot sizes in the Farming Zone and Rural Activity Zone within 100 kilometres of Melbourne. Noting this appears to require an amendment to the *Planning and Environment Act 1987*, investigate measures to prevent a rush of rural subdivision applications in the wake of the recent release of the Action Plan and prior to the implementation of this action.
3. Skills development in food systems planning and food literacy is needed at all levels of government so that long-term planning and policy actions promote a resilient, sustainable, healthy, and fair food system for Melbourne.
4. Sustainable agricultural practices that are associated with productive uses should be a specific inclusion in the purposes of each rural zone in Victoria. The support for "sustainable agriculture" in Victorian planning schemes could be strengthened, along with additional guidance on what attributes sustainable agriculture is likely to have. For example, agroecological production models are recognised as providing and supporting biodiversity enhancement, sustainable land management, and the retention of landscape values.

Appendix B: Email to Kat Theophanous re VicHealth, 12th December 2025

Dear Kat

Keep VicHealth independent and strong

I am writing to urge you and the Victorian government to keep VicHealth as an independent agency and abandon plans to move it to the Department of Health.

As the world's first health promotion foundation, VicHealth has been instrumental in major reforms and initiatives, including the Quit and SunSmart programs, the Stephanie Alexander Kitchen Garden program, the This Girl Can Program to support Victorian women and girls to be active, and the first Victorian breast screening and cervical screening programs.

VicHealth's work has been especially impactful in the field of healthy, sustainable and fair food systems across the state and to Sustain's work as Victoria's leading healthy and sustainable food systems organisation. In particular:

- In 2019, VicHealth recognised our long-term partnership with Cardinia Shire Council on the collective impact Cardinia Food Circles initiative with [a Health Promotion Award for 'outstanding efforts to improve community health across Victoria'](#). This prestigious award provided us and Cardinia Shire Council with confidence and encouragement to continue with the further development of the Food Circles initiative as well as adapt and replicate this model in other places, notably in the City of Banyule with whom we partnered in 2022-23 to create their first [Urban Food Strategy](#)
- In 2021, VicHealth funded us to write three core health promotion modules, [Building Better Food Systems for Healthier Communities](#), as a core component in its Local Government Partnership flagship. These modules led directly to several collaborative partnerships that we worked on with local governments in subsequent years, including the Ballarat Local Food Coalition, the Golden Plains Local Food Network, the Rural City of Wangaratta Sustainable Food Alliance and the Central Goldfields Food System Roadmap. This LGP flagship, now expanded through Partners in Place (see below), has been vital in building capacity, experience and motivation in local governments across the state in working to address systemic barriers to good health and wellbeing
- VicHealth has been vital to our [place-based urban farm food justice and First Nations internships at Oakhill Food Justice Farm and Bundoora Park Farm](#), through their Growing Healthy Communities funding stream
- VicHealth's ground-breaking [Local Partnerships for Food First](#) places our [Australian Food Network digital platform](#) for food system changemakers at the centre of this initiative, which brings together nearly 60 organisations in 8 place-based collaborations around the state. This provides affirmation, validation and visibility for our work as well as much-needed funding. The Partnership approach that VicHealth have designed and implemented follows world-leading best practice, such as the [Sustainable Food Places](#) initiative in the United Kingdom

- VicHealth's recently concluded [Partners in Place](#) funding round will further significantly boost place-based collaborative partnerships for tackling systemic barriers to good health for Victorians as well as build the skills, knowledge and capacity of 20 local governments by placing them as leading players. We have been included as key partners by three local governments wishing to focus on food systems in this work and such funding will be vital to our ongoing viability as a small not-for-profit social enterprise
- VicHealth's strategic long-term focus on systems transformation has provided us with the confidence to advocate strongly to the Victorian and Federal governments for policy measures to tackle entrenched disadvantage and move us towards a healthy, sustainable and fair food system for all Victorians. Most recently, we were supported by VicHealth in putting together a submission to DTP, calling on the Victorian government to amend the Victorian Planning Provisions and the Planning and Environment Act to give local governments the power to stop the further expansion of the fast food industry, which is causing such tremendous harm to the health and wellbeing of Victorian children, youth and families (see attached)

In short, VicHealth's funding, strategic focus and leadership is crucial to achieving better population health outcomes for Victorians through supporting Sustain and other organisations to work for a healthy, fair and sustainable food system.

VicHealth has strong connections with communities across Victoria and it is these trusted relationships that make their place-based approaches and partnerships so effective throughout Victoria, including in Northcote and the City of Darebin.

VicHealth is effective because of its independence, its prevention-focused mandate, and its ability to partner directly with communities, researchers, and the health promotion workforce. Moving VicHealth into the Department of Health will almost certainly erode that critical independence, disrupt longstanding community partnerships and will make prevention efforts invisible within a Department whose key responsibility is hospitals and health service delivery.

The Productivity Commission has called for more investment in prevention – not less. The pressures of chronic dietary-related disease, mental ill health and growing inequities make VicHealth's evidence-based, community-led health promotion more important than ever.

This decision affects every Victorian. I respectfully ask you to support keeping VicHealth as an independent, fully funded health promotion agency.

Sincerely,

Nick

Nick Rose, PhD (*he / him*)