

National Food Security Strategy: Discussion Paper

**Response to consultation
September 2025**

Recipient

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Dietitians Australia acknowledges all traditional custodians of the lands, waters and seas that we work and live on across Australia. We pay our respect to Elders past, present and future and thank them for their continuing custodianship.

The leading voice in nutrition and dietetics

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About Dietitians Australia

Dietitians Australia is the national association of the dietetic profession with over 9000 members, and branches in each state and territory. Dietitians Australia is the leading voice in nutrition and dietetics and advocates for the profession and the people and communities we serve.

The Accredited Practising Dietitian (APD) program provides an assurance of safety and quality and is the foundation of self-regulation of the dietetic profession in Australia. Accredited Practising Dietitians have an important role in food security initiatives. Our members are dedicated to improving the health and wellbeing of all Australians through optimal nutrition practices.

This submission was prepared by Dietitians Australia staff, with contributions from the Dietitians Australia Public Health and Community Nutrition Interest Group, the Dietitians Australia Food and Environment Interest Group and other Dietitians Australia members.

Acknowledgement of Country

We acknowledge the Traditional Custodians of Country throughout Australia and recognise their enduring connections to land, waters, and food systems. We pay our respects to Elders past, present and emerging, and extend this respect to all First Nations peoples. We recognise the importance of Indigenous food sovereignty and knowledge in shaping a just and sustainable food future.

Key Recommendations

Dietitians Australia proposes the recommendations listed below in response to the Feeding Australia strategy consultation. The recommendations are discussed further in the following sections of the submission.

General recommendations:

1. Strengthen the scope and intent of the Feeding Australia strategy to address health outcomes and dietary patterns.
2. Recognise safe access to food and water as a human right within the Feeding Australia strategy.
3. Strengthen the focus on environmental sustainability and align with international best practice to ensure long-term food system viability.
4. Further integrate water security across the strategy as a vital component of the whole-of-system approach to the Strategy's Health and Nutrition section.
5. Strengthen the Collaborative principle by ensuring governance structures include cross-departmental representation and lived-experience advisory bodies.
6. Align the strategy with global best practice as defined in international government agreements.

Recommendations in response to discussion questions:

7. Introduce **"Equity and Inclusion"** as a standalone principle in recognition of the economic and social barriers to food security and to ensure these barriers are suitably addressed throughout the framework.
8. Embed **"Nutrition security"** as a key priority area to optimise health and wellbeing and combat malnutrition in all its forms including undernutrition, micronutrient deficiencies and overweight/obesity.
9. Strengthen the wording "Resilient supply chains" to **"Resilient and sustainable supply chains"** to reflect the importance of long-term environmental stewardship.
10. Strengthen the wording "People" to **"People, culture and equity"** to reflect the importance of structural and cultural dimensions of food insecurity.
11. Embed **"Monitoring and accountability"** as a whole-of-system consideration and commit to regular monitoring of health, affordability and ecological outcomes.

Discussion

Dietitians Australia welcomes the Australian Government's commitment to developing a National Food Security Strategy and appreciates the opportunity to contribute to its development. Accredited Practising Dietitians work directly with individuals and communities, and witness firsthand the adverse impacts of food insecurity on Australians' physical and mental health and wellbeing¹.

Accredited Practising Dietitians are uniquely positioned to co-design food security strategies and should be engaged at every stage of the food system including policy formulation, implementation and evaluation to ensure that strategies are both evidence-based and meet community needs². This includes the development of nutritious food environments and initiatives that build nutritional literacy.

Response Recommendation 1: Strengthen the scope and intent of the Feeding Australia strategy to address health outcomes and dietary patterns.

The Feeding Australia strategy is an important first step in promoting the health and wellbeing of Australians through food and nutrition security. Dietitians Australia believes that the Feeding Australia strategy needs to be strengthened through³:

- Being grounded in four key principles of health, equity, environmental sustainability and accountability
- Recognising unhealthy diets as the leading preventable risk factor for disease⁴
- Prioritising public health outcomes and implementing strategies that reflect the Australian Dietary Guidelines
- Alignment with the National Obesity Prevention strategy and National Breastfeeding Strategy
- A commitment to a comprehensive, ongoing national food and nutrition monitoring program to benchmark and assess Australia's food and nutrition system and support evaluation of policies and strategies
- Thorough integration with a fully funded, comprehensive National Nutrition Strategy and National Nutrition Implementation Action Plan, as detailed in the [National Nutrition Strategy Position paper by Dietitians Australia](#)³.

Response Recommendation 2: Recognise safe access to food and water as a human right within the Feeding Australia strategy.

Dietitians Australia affirms that access to safe, nutritious, sufficient food and drinking water is a fundamental human right and is foundational to the health and dignity of all people. The right to adequate food is enshrined in the International Covenant on Economic, Social and Cultural Rights (Article 11), which Australia ratified in 1976⁵. As a party to this treaty, the Australian government must respect, protect and fulfil this right. It is vital that access to food and water are recognised as rights within the Feeding Australia Strategy.

Response Recommendation 3: Strengthen the focus on environmental sustainability and align with international best practice to ensure long-term food system viability.

The strategy must explicitly address threats beyond climate change, and include biodiversity loss, water systems degradation, soil degradation, and chemical pollution^{6,7,8,9}. These align with the Sustainable Healthy Diets: Guiding Principles and the planetary boundaries framework, both crucial to ensuring long-term food system viability^{10,11}. Guidance is also contained in the Global Food Policy

Report 2024: Food Systems for Healthy Diets and Nutrition¹². The strategy should consider a circular economy approach and align food security actions with environmental goals¹³.

Response Recommendation 4: Further integrate water security across the strategy as a vital component of the whole-of-system approach to the strategy's *Health and nutrition* section.

Water security is fundamental to food security and should be integrated throughout the strategy to build resilience across agricultural systems and to support the whole-of-system consideration of the strategy's Health and nutrition section^{14,15}. In agricultural systems, reliable water access sustains livestock, supports soil health, promotes crop diversity and maximises yields to ensure a steady supply of nutritious foods.

At the household level, safe, clean drinking water is vital for hydration, sanitation and the preparation and consumption of food without risk of illness. Despite this, rural, remote and First Nations communities face significant challenges with access to safe, clean drinking water and are more likely to rely on groundwater that is susceptible to microbial and chemical contamination^{16,17}. Lack of access to safe, clean drinking water also drives consumption of pre-packaged, sugar-sweetened beverages, exacerbating malnutrition and widening health and nutritional inequities across communities¹⁸.

Response Recommendation 5: Strengthen the *Collaborative* principle by ensuring governance structures include cross-departmental representation and lived-experience advisory bodies.

Food security is cross-cutting, requiring action from across government including departments responsible for health, social services, finance, environment, and agriculture in all jurisdictions. The governance structure must:

- Ensure representation from cross-jurisdictional government departments responsible for health, nutrition, environment, and community organisations, not only industry.
- Include people with lived-experience on advisory bodies.
- Be accountable to Cabinet, not just the Minister for Agriculture.

Response Recommendation 6: Align the strategy with global best practice as defined in international government agreements.

Australia must ensure the Feeding Australia strategy aligns with the Food and Agricultural Organisation of the United Nations (FAO) Strategic Framework, the United Nations Sustainable Development Goals, and the COP28 United Arab Emirates Declaration on Sustainable Agriculture, Resilient Food Systems and Climate Action^{19,20,21}. These frameworks provide internationally recognised pathways to integrate nutrition, sustainability, and equity into national policy.

Response to discussion questions

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

Response Recommendation 7: Introduce “Equity and Inclusion” as a standalone principle in recognition of the economic and social barriers to food security and to ensure these barriers are suitably addressed throughout the framework.

It is important to frame discussions around food security by first acknowledging that for many Australians food insecurity persists, particularly among vulnerable groups. Recent evidence indicates:

- Over 1 in 8 households (13.2%) in Australia experienced food insecurity due to lack of money for food in 2023, with 8.5% of all households experiencing this as moderate or severe food insecurity²².
- Over 1 in 3 households with a single parent and dependent children experienced food insecurity in 2023²³.
- Nearly 1 in 2 Aboriginal and Torres Strait Islander households surveyed experienced food insecurity due to not having enough money for food in the previous 12 months²⁴.

Despite exporting around 70% of its agricultural output, Australia still grapples with economic and social barriers that undermine food security at home. Relying solely on production figures can obscure hidden pockets of food insecurity. Disparities in food security between communities are fuelled by low incomes, insecure housing, supermarket concentration and geographic isolation²⁵. A national food security strategy must centre on equity and inclusion and utilise whole-of-government approaches to meaningfully address economic and social barriers. The strategy must embed targeted measures that improve financial stability, diversify access options and strengthen local supply chains.

Equally important is upholding Indigenous food sovereignty. This requires genuine partnerships with First Nations peoples to co-design solutions that respect cultural knowledge, protect traditional food systems and support self-determination. Finally, the strategy must champion cultural appropriateness and justice for groups disproportionately impacted by food insecurity.

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

Dietitians Australia wishes to emphasise that short-term emergency food relief, while vital for many communities, does not equate to food security. Longer-term systemic shifts are required to meaningfully improve food security in Australia. The strategy should deliver action across all timeframes, with a focus on developing well-planned, co-designed long-term initiatives with key deliverables at 5 and 10 years. This could follow a roadmap implementation process as outlined by [SUSTAIN’s recommendations](#) and include recommendations from Dietitians Australia position on national food security including the [national adaptation plan issues paper](#)^{26,27}.

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

Dietitians Australia has completed, and is currently progressing several initiatives related to food security to advocate, build public awareness and build capability within the profession:

1. [National Nutrition Strategy Position Paper](#)³.

A joint position statement with the Public Health Association of Australia, Nutrition Australia and the Heart Foundation. It presents a comprehensive overview of Australia's diet-related public health crisis and details the necessity of a National Food and Nutrition Policy. The Policy must be backed by an appropriately resourced, evidence-based National Nutrition Strategy. This strategy would also be an essential component of the National Obesity Prevention Strategy and National Breastfeeding Strategy and would deliver multiple complementary benefits in terms of health, the economy, equity and environmental sustainability.

2. [Dietitians Australia Position Statement on Healthy and Sustainable Diets](#)²⁸.

This statement outlines current research on healthy and sustainable diets and presents policy strategies grounded in evidence to support their adoption. It describes a framework for human and planetary health. The position statement recommends:

- Developing a National Food and Nutrition Strategy which honours Indigenous knowledges on food systems.
- Integrating sustainability principles into Australia's dietary guidelines.
- Reorienting the food environment to prioritise access to healthy and sustainable foods.
- Investing in capacity building activities to equip the current and future nutrition and dietetic workforce.

The statement is for use by practitioners and policy makers alike.

3. Dietitians Australia Policy and Practice Statement on Household Food and Nutrition Security (in progress).

This statement will provide dietitians with policy and practice guidance relating to how to advocate for and support household food and nutrition security. The implications of the policy and practice will be in both prevention and in intervention strategies for individuals and communities that may be experiencing food insecurity.

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

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

Response Recommendation 8: Embed "Nutrition security" as a key priority area to optimise health and wellbeing and combat malnutrition in all its forms including undernutrition, micronutrient deficiencies and overweight/obesity.

Nutrition security must be explicitly included as a key priority area. Nutrition security is a condition in which all people, at all times, have not only physical and economic access to sufficient, safe, and culturally appropriate food, but also to the resources, knowledge, and services needed to consume and utilise that food for optimal health and wellbeing^{29,30}.

Nutrition security goes beyond food security, which focuses primarily on availability and access to food, by explicitly integrating diet quality, diversity, and the ability of the body to use nutrients effectively.

Key elements include:

- Availability of nutritious foods (particularly fresh, minimally processed foods).
- Accessibility – affordability, cultural appropriateness, and geographic access.
- Utilisation – the ability of individuals to prepare and consume foods that meet nutritional needs.
- Stability – sustained and reliable access over time, not just temporary availability.
- Health context – safe water, sanitation, healthcare, and education to ensure the body can absorb and use nutrients effectively.

Including nutrition security as a key priority area ensures that food systems don't just feed people, but nourish them, aligning with the FAO's expanded definition of food security and reflecting the importance of diet quality for preventing malnutrition in all its forms (undernutrition, micronutrient deficiencies, and overweight/obesity)^{30,31}. The Feeding Australia Strategy should be guided by the Food and Agriculture Organization of the United Nations' [Voluntary Guidelines to Support the Progressive Realization of the Right to Adequate Food in the Context of National Food Security](#)³².

The strategy should focus on actions including:

- Improving access to the five core food groups in the Australian Dietary Guidelines, particularly in rural and remote areas by strengthening supply chains.
- Building public nutritional literacy through health promotion programs, co-designed with Accredited Practising Dietitians.
- Shifting procurement policies to prioritise nutritious, locally sourced, sustainable and minimally processed foods.
- Protecting and promoting breastfeeding through stronger regulation and public health initiatives co-designed with Accredited Practising Dietitians.
- Building culinary skills for individuals and communities, including food safety and waste reduction.
- Including Accredited Practising Dietitians in co-design of food security strategies.
- Updating the national curriculum to place greater emphasis on:
 - Nutrition and its relationship to health and wellbeing
 - Basic cooking skills
 - Understanding of local food systems and agricultural systems
 - Relationship between food systems and climate change
 - Planetary health.

Response Recommendation 9: Strengthen the wording “Resilient supply chains” to “Resilient and sustainable supply chains” to reflect the importance of long-term environmental stewardship.

Sustainability is critical for building truly resilient supply chains, requiring the adoption of regenerative farming practices, robust water security measures and proactive climate-risk mitigation to safeguard production into the future.

Further, current interpretations of productivity and resilience often prioritize large-scale, export-oriented agriculture at the expense of community wellbeing. Instead, we should redefine

productivity to deliver genuine benefits, measured through enhanced population health outcomes, community food economies and environmental sustainability.

The strategy should focus on actions including:

- Building resilience through localised supply chains, community-led initiatives and climate-smart agricultural practices
- Strengthening local and regional food systems by supporting sustainable and resilient community-based production, processing and distribution networks.

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

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

Response Recommendation 10: Strengthen the wording “People” to “People, culture and equity” to reflect the importance of structural and cultural dimensions of food insecurity.

People, culture and equity are core considerations in the development of a food security strategy. Food insecurity disproportionately impacts low-income households, First Nations communities and culturally and linguistically diverse communities. Approaches that incorporate equity will be better able to address systemic barriers to food security. We suggest that “People, culture and equity” are placed in the centre of the framework, to reinforce this.

We recommend:

- Prioritising Indigenous food sovereignty, cultural appropriateness, and justice for groups disproportionately impacted by food insecurity
- Addressing the structural issues that drive food insecurity, including low income, insecure housing, supermarket concentration and geographic isolation
- Implementing meal provision programs in early childhood education and care and schools to support equitable food access.

Response Recommendation 11: Embed “Monitoring and accountability” as a whole-of-system consideration and commit to regular monitoring of health, affordability and ecological outcomes.

Robust, nationally consistent data collection is needed to track food insecurity, diet quality, and affordability. Monitoring must also assess ecological outcomes of food systems. Without this, progress cannot be measured or sustained.

We recommend:

- Gathering data on food security status, nutrition status, dietary intake and environmental impact in 2-year intervals to understand the current situation, inform decision making and refinement of the strategy over time.
- Conducting stakeholder mapping and clearly delegating roles and responsibilities for key collaborative and interjurisdictional actions within the strategy.
- Investing in research to explore the relationship between food insecurity and both physical and mental health outcomes.

Conclusion

The Feeding Australia Strategy must be ambitious, equitable and health-centred. Food and nutrition security cannot be achieved through agricultural productivity alone. It requires a coordinated national approach that places nutrition, equity, environmental sustainability and accountability at the heart of the food system. By adopting the recommendations above, the government can ensure that every person in Australia has reliable access to nutritious, affordable, culturally appropriate, and environmentally sustainable food, both now and into the future.

Dietitians Australia would welcome the opportunity to continue to work with the government on the development of this important strategy. We strongly encourage close collaboration with our association and our members.

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