

Brief on the National Food Plan Issues Paper

Introduction

This document provides a brief overview of the background to the development of the National Food Plan and some comments on the [Issues paper to inform development of a national food plan](#). The aim of this document is to assist you in responding to the issues paper and in on-going advocacy in relation to the development of the National Food Plan.

If you are interested in receiving more information about the development of the National Food Plan or in joint advocacy on national food policy with other public interest groups from the food, health and environment sectors, please contact Kathy McConell or Rachel Carey at the Food Alliance.

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Background

The development of a National Food Plan was [announced in August 2010](#), prior to the last federal election. Several groups have called for the development of a ‘whole of government’ national food policy over the last few years, including the [Public Health Association of Australia](#), the National Preventative Health Taskforce and the [Australian Food and Grocery Council](#). Work began on the development of the National Food Plan in [December 2010](#).

The Minister for Agriculture, Senator the Hon Joe Ludwig, is leading the development of the [National Food Plan](#) and day to day work is carried out by the Food Branch of the [Agricultural Productivity Division](#) of the Department of Agriculture, Fisheries and Forestry (DAFF).

A [National Food Policy Working Group](#) has been set up “as a forum for active communication between the food industry and government to foster a common understanding of the industry’s priorities, challenges and future outlook across the supply chain”. This group is advising on the development of the National Food Plan. It is comprised primarily of food industry representatives, with one health representative and one consumer representative. A [Food Processing Industry Strategy Group](#) is also advising on the development of the Plan.

Comments on the Food Plan development process

A number of groups including the [Australian Food Sovereignty Alliance](#), the [Public Health Association of Australia](#) and the [Sydney Food Fairness Alliance](#) have expressed concerns about the policy development process for the National Food Plan. The Food Alliance also has concerns about this process:

- **Narrow stakeholder involvement** – the National Food Policy Working Group is heavily weighted towards the food industry and lacks appropriate representation from health, environment and community groups
- **No public engagement in the development of the plan** – the consultation on the National Food Plan issues paper is the only mechanism for the general public to engage with the

National Food Plan, but this formal document (of over 100 pages) does not lend itself to public engagement. In contrast, the development of Scotland's National Food and Drink Policy began with an 'Open Space' event to explore what the people of Scotland expected from a national food policy and also allowed members of the public to submit their views via an online food blog¹

- **Lack of transparency** – the overall process for developing the National Food Plan is unclear and the activities of the National Food Policy Working Group lack transparency – the minutes of their meetings are not public, for example. A series of **roundtables** is also being held during August, but they are 'invitation only', it is unclear which groups are attending and whether the minutes will be made public
- **No clear mechanism for co-ordinating a 'whole of government' approach** - there is no formal mechanism to ensure a genuinely integrated, 'whole of government' approach to development of the National Food Plan. Minister Ludwig is said to be "working closely with a number of ministerial colleagues"². However, the UK government set up a sub-cabinet committee to co-ordinate national food policy prior to the development of the *Food 2030* national food strategy

The Food Alliance believes that an appropriate policy development process is critical to the development of a genuinely integrated and inclusive national food policy. We are considering facilitating some **joint advocacy, involving groups from multiple sectors, to highlight the flaws in the current policy development process** and to advocate for a more transparent, integrated and inclusive process. This could include a joint, 'open' letter to relevant Ministers to generate media interest. We'd welcome your feedback on this idea.

Comments on the National Food Plan issues paper

The [Issues paper to inform development of a national food plan](#) was released on 27 June 2011 and **responses are due by 5 pm on 5 August:**

- On a positive note, the paper covers a wide range of issues and identifies many of the drivers and trends influencing our food supply. It also recognizes the importance of 'whole of government' integration of food policy. However, it **fails to highlight the fundamental shift that is needed** towards a healthy, sustainable and fair food system. In fact, the document clearly states that the national food plan should "be consistent with the government's market-based policy approach" (p2)
- The overall emphasis of **the paper is on maximizing food production** and on food as a commodity. The chapter of the paper on **promoting a 'Competitive, productive and efficient food industry'** is by far the biggest chapter and the focus of most of the questions for consultation. **Of the 48 questions for consultation**, 24 questions are related to developing a 'Competitive, productive and efficient food industry', 4 are related to food

¹ The Scottish Government (2009) Leadership Forum Report; Development of the National Food and Drink Policy - <http://www.scotland.gov.uk/Publications/2009/06/19142130/2>

² National Food Plan - <http://www.daff.gov.au/agriculture-food/food/national-food-plan>

security, 4 to diet and nutrition, 4 to a 'sustainable **food industry**' (with just one question on **environmental sustainability**). 12 are overarching questions.

- The **lack of emphasis on the environmental impacts of food production** is one of the most significant weaknesses of the issues paper. The main emphasis of the chapter on sustainability (Chapter 6) is 'the social and economic sustainability of rural communities', and the need to shift to a low carbon, environmentally sustainable food system receives relatively little attention in comparison. This reflects the emphasis of the Australian Food and Grocery Council's paper on [A growing and sustainable industry: the case for a national food and grocery agenda](#)
- The paper is **weak on addressing nutrition and public health concerns** – questions for consultation focus on the potential role for the food industry in supporting population health and nutrition outcomes, with little emphasis on the role of government in intervening to address market failures. Chapter 4 (p 28) states that, "the government's policy is to allow commercial entities to position themselves to facilitate consumer preferences, so long as representations they make about products involved meet the requirements of Australian consumer law"
- The paper also **overlooks the role of food marketing** in driving consumption, and does not address the issue of junk food advertising to children
- The chapter on Food Security (Chapter 3) identifies a range of issues that impact food security. However, it **under-emphasises the potential of climate change and other environmental pressures** to impact Australia's future food security. The need to focus on **sustainable food security** and **the food security of future generations** is not recognized.

Proposed next steps

The Food Alliance encourages organizations to submit a response to the National Food Plan Issues Paper. Even a short response of a couple of paragraphs highlighting key issues would be valuable. Responses can be submitted [here](#).

We expect the development of the National Food Plan to continue for at least the next 12 months, providing opportunities for joint advocacy and a broader national debate about the future of Australia's food system.

The Food Alliance is planning a series of advocacy activities around the development of the National Food Plan, and would welcome the involvement of a broad range of groups from across multiple sectors.

To be kept informed of developments related to the National Food Plan and opportunities for joint advocacy, please contact Kathy McConell or Rachel Carey at the Food Alliance:

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