

National Nutrition Strategy

Policy Position Statement

- Key messages:** There is an urgent need for the Australian Government to update the 1992 National Food and Nutrition Policy into a contemporary, comprehensive and dedicated National Nutrition Strategy with a well-resourced, co-ordinated, evidence-based and strategic action plan. The development of a National Nutrition Strategy is a recommendation of the National Preventive Health Strategy and would support existing government priorities including the National Obesity Strategy, National Breastfeeding Strategy and provide the roadmap for achieving the goals outlined in the Australian Dietary Guidelines and a future national food security strategy.
- Key policy positions:** The PHAA welcomes the acknowledgement in the National Preventive Health Strategy of the need for a food and nutrition action plan and calls for sustained action and investment in developing and implementing a National Nutrition Strategy and Action Plan.
- The PHAA calls on the Australian Government to develop, fund and implement a National Nutrition Strategy and Action Plan that:
1. reflects consensus public health principles [health, equity, sustainability],
 2. be evidence-informed, adequately funded, implemented, monitored and evaluated, and
 3. be informed by a consultative process, free from conflicts of interest.
- Audience:** Federal, state and territory governments, policymakers and program managers, PHAA members, media.
- Responsibility:** PHAA Food and Nutrition Special Interest Group
- Contact:** Food & Nutrition SIG FANSIG@phaa.net.au
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PHAA affirms the following principles:

1. A dedicated National Nutrition Strategy is urgently required to address unhealthy eating patterns in Australia.
2. Outlined here is general agreement about what constitutes healthy and sustainable eating patterns^a and on the policy actions that are required to enable healthy and sustainable eating.
3. On the basis of this evidence, and as outlined in the PHAA's key policy statements (Table 1), the following principle is affirmed:
A National Nutrition Strategy needs to:
 1. reflect consensus public health principles [health, equity, sustainability],
 2. be evidence-informed, adequately funded, implemented, monitored and evaluated, and
 3. be informed by a consultative process, free from conflicts of interest.

PHAA affirms the following evidence:

4. Unhealthy eating patterns are a leading preventable risk factor contributing to the burden of disease in Australia.¹
5. This is also the case throughout the world, indicative of a food system that inhibits reliable access to foods that support health, and contributes to malnutrition in all its forms and climate change.^{2,3}
6. Evidence shows that complex factors influence our eating patterns, including social, environmental, cultural, commercial and political determinants⁴ as well as physiological, psychological and health-related factors.⁵
7. Globally and nationally, there is broad agreement about what constitutes healthy eating patterns^{6,7} and there is strong evidence around the most cost-effective policy actions to enable healthy and sustainable eating.⁸⁻¹⁰
8. Government leadership, supported by a dedicated National Nutrition Strategy, is essential to creating social change regarding behaviours and attitudes towards food and nutrition by guiding, prioritising and directing effort and investment.^{11,12} There is an urgent need for the Australian Government to update the 1992 National Food and Nutrition Policy into a contemporary, comprehensive and dedicated National Nutrition Strategy with a well-resourced, co-ordinated, evidence-based and strategic action plan.
9. A coordinated 'whole-of government' approach is required to support national, state and local governments to work together with non-government and civil society organisations, industry and community to foster unhealthy food environments, reduce the incidence, prevalence and cost of diet-related disease, and

^a Healthy and sustainable eating, as described in the United Nations Sustainable Development Goals as "Sustainable Healthy Diets", are 'dietary patterns that: promote all dimensions of individuals' health and wellbeing; have low environmental pressure and impact; are accessible, affordable, safe and equitable; and are culturally acceptable. The aims of Sustainable Healthy Diets are to: achieve optimal growth and development of all individuals and support functioning and physical, mental, and social wellbeing at all life stages for present and future generations; contribute to preventing all forms of malnutrition (i.e. undernutrition, micronutrient deficiency, overweight and obesity); reduce the risk of diet-related non-communicable diseases; and support the preservation of biodiversity and planetary health. Sustainable healthy diets must combine all the dimensions of sustainability to avoid unintended consequences' (7)

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promote health and wellbeing. These actions will also contribute to decreasing the impact of food systems on climate change.

10. The development of a National Nutrition Strategy is a recommendation of the National Preventive Health Strategy,¹² and would support existing government priorities including the National Obesity Strategy,¹³ National Breastfeeding Strategy,¹⁴ National Eating Disorders Strategy¹⁵ and provide the roadmap for achieving the goals outlined in the Australian Dietary Guidelines and a national food security strategy.

PHAA seeks the following actions:

11. PHAA will work in consensus with public health groups to call on the Australian Government to develop, fund and implement a National Nutrition Strategy and Action Plan, as a key recommendation of the National Preventive Health Strategy.
12. A National Nutrition Strategy needs to:
 1. reflect consensus public health principles [health, equity, sustainability],
 2. be evidence-informed, implemented, monitored and evaluated, and
 3. be informed by a consultative process, free from conflicts of interest.
13. PHAA provides the following recommendations on the key elements^b to consider in the development of a National Nutrition Strategy and Action Plan:
 1. Implement the actions set out in the National Preventive Health Strategy, including the target to allocate at least 5% of health expenditure to prevention.
 2. Commit to a suite of measures to reduce diet-related chronic diseases and promote healthy and sustainable food systems and population dietary patterns, such as:
 - a. Legislate bans on the marketing of unhealthy foods and beverages, covering all media and settings;
 - b. Implement improvements to food labelling regulations, including mandating and strengthening the Health Star Rating front-of-pack labelling scheme, requiring comprehensive added sugar information to be displayed on pack, and improving labelling for infant and toddler foods;
 - c. Consistently fund ongoing public health promotion campaigns;
 - d. Introduce a tiered levy on sweetened beverage manufacturers (for both sugar and artificially sweetened beverages; and
 - e. Ensure that a strong health focus continues to feature in food regulation.
 3. Actions should be informed by contemporary evidence-based criteria and be consistent with national food-based dietary guidelines.^c

PHAA resolves to:

14. Advocate for the above steps to be taken based on the principles in this position statement.
15. Be informed by the evidence and recommendation across its suite of Food and Nutrition Policy Statements

^b Evidence and recommendations summarised in a range of PHAA Food and Nutrition Policies should be drawn on in the consultation and development of the Strategy. These are summarised in Table 1. These points are also summarised at: [PHAA Election priorities for the 2025 federal election](#)

^c See key [PHAA policy statements on our website](#), including Fiscal Policies for Foods and Beverages, Health Levy on Sugar Sweetened Beverages, Protecting Children from the Marketing of Unhealthy Foods and Beverages, Sugar Labelling Position, Ultra Processed Food

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16. Work in consensus with public health groups to advance this policy position. PHAA and leading health groups have advocated for action on a National Nutrition Strategy for many years; this statement is the third edition of the position and builds on a considerable history across public health organisations calling for action in this space. ^{14,16,17}

Adopted 2017, revised 2021 and 2025

References

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13. Commonwealth of Australia. National Obesity Strategy 2022-2032. Canberra: 2022.
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15. Australian Government Department of Health and Aged Care. (2021). *National Eating Disorders Strategy 2021–2031*. Canberra: Australian Government.
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Table 1. Recommendations, Principles and Evidence to inform the development of a National Nutrition Strategy.

Recommendation (new)	Principle (new)	Aspects to be addressed within a National Nutrition Strategy (references to existing PHAA Policy Statements)
<p>Recommendation 1: A National Nutrition Strategy needs to reflect consensus public health principles: health, equity, sustainability.</p>	Health	<ul style="list-style-type: none"> ● address the full spectrum of malnutrition in Australia, including from over-consumption of unhealthy foods and drinks, under-consumption of healthy foods, as well as undernutrition from food insecurity, micro-nutrient deficiencies and sub-optimal infant feeding. [PHAA Background Paper: National Nutrition Policy.] ● consider the health, social, economic, and environmental dimensions of the food system as an important population health priority. [PHAA Policy: Food System, Diets and the Environment Position]
	Equity	<ul style="list-style-type: none"> ● address household, food and nutrition security, and its determinants, in the implementation of a National Nutrition Strategy, in order to action the Sustainable Development Goals. See specific actions outlined in [PHAA: Household Food and Nutrition Security] ● Implement recommendations and report on outcomes of various recent inquiries relevant to food security. PHAA Food Security for Aboriginal and Torres Strait Islander People]
	Sustainability	<ul style="list-style-type: none"> ● Explicitly respond, using both mitigative and adaptive actions, to the threat of climate disruption on food supply and equitable food access. [PHAA: Climate Disruption, the Food System, and Food Security] ● Incorporate and promote a planetary health approach to the food system and nutrition that recognises the relationships between human health and the environment [PHAA: Food System, Diets and the Environment Position] ● An enabling policy environment to support adoption of sustainable agriculture and food-processing practices, including investing in renewable energy, enhancing energy efficiency, and demand reduction strategies as responses to climate change. [PHAA: Food System, Diets and the Environment Position]
<p>Recommendation 2: A National Nutrition Strategy needs to be evidence-informed, adequately funded,</p>	Evidence-informed	<ul style="list-style-type: none"> ● Informed by international evidence-based characteristics of a healthy and ecologically sustainable diet [PHAA: Food System, Diets and the Environment Position] ● Informed by a nutrition science based ‘Fit-for-Purpose’ framework that guides the selection of dietary patterns, food-based and/or nutrient-based approaches to nutrition in accordance with which approach aligns with the purpose of the Strategy [PHAA: Dietary Patterns, Food-Based Guidelines and Nutrition Policy]

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Recommendation (new)	Principle (new)	Aspects to be addressed within a National Nutrition Strategy (references to existing PHAA Policy Statements)
implemented, monitored and evaluated,	Funded	<ul style="list-style-type: none"> ● Implement the actions set out in the National Preventive Health Strategy, which commits to a implementing a National Nutrition Strategy and Action Plan, including the target to allocate at least 5% of health expenditure to prevention. [PHAA: PHAA Election priorities for the 2025 federal election]
	Implementation	<ul style="list-style-type: none"> ● Ensure a National Nutrition Strategy is accompanied with an implementation plan and funding. ● Coordinate and integrate cross-sectoral policies, priorities and programs that relate to food and nutrition [General Principle across most PHAA policies] ● Inclusion of health and environmental considerations in food supply policy and implementation, including production, processing, distribution and retail of foods aligned, at a minimum, with the Australian Dietary Guidelines to support availability and affordability of healthy diets. [PHAA: Food System, Diets and the Environment Position] ● Identify policy actions to promote healthy and sustainable population eating patterns and food systems, such as labelling information to guide product selection, restrictions on product marketing, restricting product availability in specific settings, and setting financial incentives and disincentives, should be based on contemporary evidence-based criteria and be consistent with national food-based dietary guidelines. <ul style="list-style-type: none"> ○ Align with existing evidence-informed policies to implement, including Food Policy Index and recommendations in key PHAA policies: Fiscal Policies for Foods and Beverages Position , Health Levy on Sugar Sweetened Beverages, Protecting Children from the Marketing of Unhealthy Foods and Beverages Position, Sugar Labelling Position, Ultra Processed Food Position
	Monitoring + Evaluation	<ul style="list-style-type: none"> ● Facilitate a comprehensive Food and Nutrition Monitoring and Surveillance program assessing dietary intake, food availability, household spending, infant feeding practices, sustainability, and food environments, including digital settings, thereby informing policy and program development. Key components should include regular dietary surveys, food supply monitoring, consumption data analysis, and oversight of broader food and nutrition monitoring activities. [PHAA: Food and Nutrition Monitoring and Surveillance in Australia] ● Improve monitoring and surveillance on food security and its determinants to enable better access to culturally appropriate and healthy foods for Aboriginal and Torres Strait Islander Peoples. [PHAA Food Security for Aboriginal and Torres Strait Islander People]
Recommendation 3: A National Nutrition	Consultation & representation	<ul style="list-style-type: none"> ● Be developed in consultation with experts in the fields of public health, food systems and climate change, with a human rights-based approach to food at its core [PHAA: Climate Disruption, the Food System, and Food Security].

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Recommendation (new)	Principle (new)	Aspects to be addressed within a National Nutrition Strategy (references to existing PHAA Policy Statements)
<p>Strategy needs to be informed by a consultative process, free from conflicts of interest.</p>		<ul style="list-style-type: none"> ● Recognise the knowledge and expertise of Aboriginal and Torres Strait Islander Peoples on food sustainability and food systems, and empower Aboriginal and Torres Strait Islander Peoples to have decision-making authority in the co-design, implementation and evaluation of policies and place-based programs in alignment with the National Agreement on Closing the Gap. [PHAA: Food Security for Aboriginal and Torres Strait Islander People and PHAA: Food System, Diets and the Environment Position] ● Ensure the coordinated engagement of local government, relevant industries (e.g., food manufacturing, retailing and marketing, advertising, media) and non-government organisations, and sport and recreation groups to ensure that action on obesity is high on their agenda. [PHAA: Prevention of Overweight and Obesity] ● As per international guidance, the food industry should be consulted regarding the implementation of any new nutrition policy initiatives that relate directly to the food industry. However, this process of consultation should be clear and transparent, and food industry should not be involved in decision-making [PHAA: Involvement of the Food Industry in Nutrition Policy Position]
	<p>Commercial Interest & Determinants of Health</p>	<ul style="list-style-type: none"> ● Decision-making on nutrition policy needs to occur without the involvement of commercial interests (regardless of a company’s alignment with public health nutrition goals) or informed by evidence funded by industries with a commercial interest (e.g. food and beverage industry, agri-food industry and pharmaceutical companies). [PHAA: Involvement of the Food Industry in Nutrition Policy Position and [PHAA: Food System, Diets and the Environment Position]
	<p>Policy Cohesion & Coordination</p>	<ul style="list-style-type: none"> ● Provide the mechanism to implement the National Obesity Strategy and the National Preventive Health Strategy food and nutrition actions in full. [PHAA: Prevention of Overweight and Obesity] ● Be comprehensive, system-wide, cross-sectoral strategy is required across relevant government portfolios including Prime Minister and Cabinet (lead), Health, Finance, Treasury, Social Services, Agriculture and Water, Veterans Affairs, Environment and Energy [PHAA: Household Food and Nutrition Security] ● Recognise determinants of health, including mental health via prevention and management (in time, in place) strategies, as well as mitigation strategies for domestic, family and personal violence, and the prevention of racism, all of which are linked with food insecurity [PHAA: Household Food and Nutrition Security]