Public Health Association of Australia and Cancer Council Australia submission on inquiry into food pricing and food security in remote Indigenous communities

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Contents

Introduction 4

PHAA Response to the Inquiry Terms of Reference 4

1. The environment in which Remote Community retailers operate ........................................4
2. The licensing and regulation requirements and administration of Remote Community stores........6
3. The governance arrangements for Remote Community stores .............................................6
4. Comparative pricing in other non-Indigenous remote communities and regional centres ........ 10
5. Barriers facing residents in Remote Communities from having reliable access to affordable fresh and healthy food, groceries and other essential supplies .......................................................... 12
6. The availability and demand for locally produced food in Remote Communities ................. 18
7. The role of Australia's food and grocery manufacturers and suppliers in ensuring adequate supply to Remote Communities, including: ................................................................. 20
8. The effectiveness of federal, state and territory consumer protection laws and regulators in: ... 21
9. Any other relevant factors ........................................................................................................ 23

Conclusion 24

References 25
The Public Health Association of Australia (PHAA) is recognised as the principal non-government organisation for public health in Australia working to promote the health and well-being of all Australians. It is the pre-eminent voice for the public’s health in Australia. The PHAA works to ensure that the public’s health is improved through sustained and determined efforts of our Board, National Office, State and Territory Branches, Special Interest Groups and members.

We believe that health is a human right, a vital resource for everyday life, and a key factor in sustainability. Health equity and inequity do not exist in isolation from the conditions that underpin people’s health. The health status of all people is impacted by the social, cultural, political, environmental and economic determinants of health. Specific focus on these determinants is necessary to reduce the unfair and unjust effects of conditions of living that cause poor health and disease. These determinants underpin the strategic direction of the Association.

Our mission as the leading national organisation for public health representation, policy and advocacy, is to promote better health outcomes through increased knowledge, better access and equity, evidence informed policy and effective population-based practice in public health. Members of the Association are committed to better health outcomes based on these principles.

Our vision is for a healthy population, a healthy nation and a healthy world, with all people living in an equitable society underpinned by a well-functioning ecosystem and a healthy environment, improving and promoting health and wellbeing for all.

The reduction of social and health inequities should be an over-arching goal of national policy, and should be recognised as a key measure of our progress as a society. Public health activities and related government policy should be directed towards reducing social and health inequity nationally and, where possible, internationally.
Introduction

PHAA welcomes the opportunity to provide input to an inquiry into food pricing and food security in remote Indigenous communities. Please note that this submission is co-signed by the Cancer Council Australia.

Food security refers to regular access to good quality food in sufficient quantities. Food security is a fundamental human right - the Universal Declaration of Human Rights states “everyone has the right to a standard of living adequate for the health and well-being of himself and of his family, including food”. People living in remote communities report being able to choose healthy food and fulfill their responsibilities, when they have access to nutritious food.

Food insecurity, a lack of regular and reliable access to food, is reportedly experienced by 4% of the Australian population, however, Aboriginal and Torres Strait Islander communities disproportionately experience food insecurity at higher rates. As many as one-quarter (24%) of Indigenous people report having run out of food in the previous 12 months and could not afford to buy more, many going without. However, people living in remote communities are often underrepresented in these national surveys.

Food security is a central factor in diet and can contribute to short and long term health implications such as nutrient deficiencies, poor growth and development, poorer academic performance, low self-esteem and self-efficacy.

Given the disproportionate prevalence of food insecurity among people living in remote communities, and the significant impact on short and long term health, it is imperative that along with environmental and store-level changes, the underlying structural determinants of food security are improved. These include employment, income, and housing, among others.

PHAA Response to the Inquiry Terms of Reference

1. The environment in which Remote Community retailers operate

Not your average local corner store

Remote stores must not only deliver an essential service in remote Aboriginal and Torres Strait Islander communities but in circumstances vastly different from those found in urban settings, which impact upon the roles, functions and operations of the stores. This context is vital to an holistic understanding of the importance of these stores in these remote communities.

Remote stores operate in an environment where there is limited competition, small turnover and high operational costs. In many communities, there is only one food store providing food for their whole community. Therefore, such stores should be seen as an essential service for the community and supported in this role. Unlike grocery retailers in towns, they must also ensure they are able to cover higher freight costs, higher building and maintenance costs, higher utility costs and staff housing and vehicles with often small turnover while continuing to be viable.

In some communities, the store is community-owned and operated, while in other communities, the store is privately run. This has direct impacts on the local community with some providing an important source of employment for local residents, with others seeing a substantial cost in salaries to employees who are not from the local community.
The store is often the only outlet community members have to access food and therefore is an essential part of the community and plays a vital role in the health of community members. This has been recognised by a number of the store operators who implement health initiatives in partnership with health services and researchers to address the gap in health outcomes between Aboriginal and Torres Strait Islanders and non-Indigenous Australians. However, these initiatives are often seen by stores to be a hindrance to store turnover and the operation of a profitable business. Strategies aimed at increasing store turnover while supporting stores to also undertake health initiatives in partnership with community organisations are critical in ensuring stores are able to meet these two components of remote stores’ role in communities.

The practicalities of running a remote community store
It is clear that remote community store retailers operate in a challenging environment. There are freight issues, frequent power outages in many communities which can take some time to fix, political issues and pressure to sell certain volumes and products. New store managers have been hired and sent out to manage stores in remote communities with very little support, training or mentoring.

Freight is costly for the operator. The cost of wages and reimbursement for staff, the toll on vehicles and the intensity of maintenance required is extremely high. In addition, the operators require a profit margin to maintain and grow their business. The market for freight operators is very thin and the lack of suppliers lead to a thin market where the operators can pretty much name their price. An example includes an operator who ran the stores and the freight as well as the fuel supply. This conglomerate was operated on behalf of the Traditional Owners. It created a situation of a monopoly that made it very difficult for individuals to operate outside this conglomerate. There was one store selling good quality and fresh food that came in from a different depot via a different freight operator. The operations of this store were at times hampered by the refusal of permission for the other freight operator to enter the community—a permit to enter the community was required.

Some stores have an adjoining takeaway food area and commercial kitchen, which often provides energy-dense, nutrient-poor junk foods. Many residents in remote communities have suboptimal or poorly functioning food preparation and cooking facilities, or none at all. Only six per cent of households in remote communities reportedly had sufficient food preparation and cooking facilities between 1999-2013. As a result, some community members shop for food multiple times daily. Therefore, high availability of hot, freshly cooked junk food is alluring. Standards in place should include a focus on supplying healthy takeaway options to optimise the health of the community. In addition, the adjoining kitchen facilities could be utilised for interested community members to undertake Hazard Analysis Critical Control Point (HACCP) certification, and facilitate employment pathways to sell healthy takeaway options through the stores’ adjoining takeaway service.

Recommendations:
- Consider remote community retail stores as an essential service with a strong focus on community involvement and support for remote community retailers from government, health and social agencies at a local, state and national level, and ensure they are adequately funded to support the nutrition of their communities through adequate availability, price and quality of food.
- The Australian government to provide subsidies to remote community stores to cover the cost of high overheads consistent with all other essential services in remote Aboriginal communities, including Departments of Health subsidising wages.
Implement initiatives to increase store turnover through greater purchasing of food from local and visiting services providers by:

- Incentivising organisation to utilise community stores for programs
- Funding for programs in remote communities to reflect the true cost of service delivery.

- The Australian government to fund public health research that develops and builds on community led initiatives that support healthy eating behaviours.
- Clear documentation of processes and responsibilities in the event that stores do not meet requirements.
- Store owners/companies must provide adequate training and support of store managers in remote communities.
- Increase governance of freight into remote communities to ensure the supply of healthy food is not compromised by other external factors.  
- Ensure store standards include a focus on affordable healthy takeaway options which could be achieved practically through community member HACCP certification to prepare and sell healthy takeaway options.

2. The licensing and regulation requirements and administration of Remote Community stores

Licensing
Remote stores often operate in an environment where there is little competition leading to opportunities for monopoly behaviour to occur around the price of essential food and grocery items. Regulation and administration of remote community stores is inconsistent across communities and states. Therefore, State-based regulation could be a consideration to ensure administration of stores is monitored.

Community stores licencing was implemented in the Northern Territory (NT) in 2007 as part of the Northern Territory National Emergency Response Act and renewed under the Stronger Futures in the Northern Territory Act in 2012. Due to the lack of competition and choice available for consumers in remote areas, the licensing scheme was designed to improve food security in remote communities by setting standards that stores need to meet around availability, quality and promotion of healthy foods, as well as financial, retail and governance processes. A store is required to be licensed if it is an important source of food, drink or grocery items for an Indigenous community.

Licencing requirements are monitored by the National Indigenous Australians Agency, and sanctions and penalties may be applied to stores which do not meet the standards. Community stores licensing does not currently apply to stores in major cities and regional centres in the NT (Darwin, Palmerston, Katherine, Tennant Creek, Alice Springs and Nhulunbuy) or in other jurisdictions in Australia which rely on using existing consumer rights regulation and business licensing to protect consumers in remote communities.

PHAA understands that since the delivery of the 2014 Australian National Audit Office report into remote communities food security, which highlighted the need for greater active monitoring of stores through stores licencing, store licencing monitoring has reduced further. With a lack of a clear mechanism for community members to make confidential complaints about stores poor management practices these issues have only been able to continue. Wage subsidies through the Departments of Health (as recommended in 1) above) may assist in both monitoring and complaints mechanisms, through the direct involvement of the Department and accompanying accountability measures.

While store licensing has been a reported success in improving retail practices and improving the quality and availability of healthy food it has not achieved reasonable pricing of healthy food with some community stores a healthy basket of food costing 150% of the average household income.
Since the introduction of stores licencing in 2007 the NT government Market Basket Surveys have found that the average number of varieties of fruit and vegetables sold in remote community stores has increased (fruit 8 to 11, vegetables 14 to 16 between 2007-2019). There has also been an increase in the variety of other healthy food products such as breads, breakfast cereals, lean meats, and canned and frozen vegetables. There has however been a slight decline in the percentage of fresh fruit and vegetables rated as ‘good’, and the cost of the healthy food basket in remote communities has been higher than projected using annual Consumer Price Index (CPI) increase between 2007-2019.

**Store managers**

Individual store managers may be in positions of power - food prices are often at the individual store managers’ discretion, which has been cited as a contributing factor for high food costs in remote locations. Anecdotally, there are numerous examples of this level of power being used inappropriately. A number of years ago, an “emergency food drop” was ordered, where food was required to be air freighted and delivered into a community. Instead of the order containing nutritious food for the community, it was reportedly an order of frozen cheesecakes and other energy-dense, nutrient-poor junk food. Another example was where a mining company reportedly provided free fresh produce to nearby communities for the residents to collect from the store free of charge. There were rumours that some people were being charged for this produce. A third example includes a store manager charging Indigenous residents higher prices than non-Indigenous residents. “Book up” is still used, whereby community members are required to supply their financial details and are able to accrue large debts for goods purchased in store, sometimes during periods where they had little money to repay the debts.

There are also many positive stories about store managers who are supporting the health of their community. These stories were often related to store managers positioning healthy food at the checkouts as point-of-purchase prompts, giving fresh fruit away for free to children as snacks, or heavily discounting them, and promoting healthy food which posters displayed on fridges to promote healthy food and drink choices. This anecdotal evidence is supported by research evidence, e.g.:

> “Although there’s still the unhealthy options on the shelves, the store managers are very health conscious in terms of having the boiled eggs and bananas at the front counter for kids to choose instead of lollies and chocolates.”

> “Local promotion included school children or women’s groups displaying healthy eating posters they had created in outlets.”

There are examples of collaborative efforts being stymied by policy and regulations. For example, a store in the NT was supporting community members to sell healthy foods that were produced or gathered by themselves. A change in the system of access to money occurred; money was no longer available as cash and a compulsory keycard system came into force. The community operation was unable to access the keycard services, therefore the “official store” became the only place where goods could be bought with a keycard.

**National Standards**

National Standards for stores and take-aways; as well as a National Quality Improvement Scheme to implement the standards has previously been proposed (and piloted in 10 places) under the COAG National Strategy for Food Security in Remote Indigenous Communities (part of the National Indigenous Reform Agreement 2009-2012). The strategy was audited in 2014 however, and it was found that resourcing was poor and few outcomes had been achieved.
A review of the Stronger Futures Act found that the response of stakeholders to stores licencing reforms in 2012 has been broadly positive. Current licencing standards in the NT may need to be adapted to be applicable nationally to avoid the imposition of unnecessary operational and stock requirements, which can create additional costs for stores, but should include minimum range for healthy food products and health hardware, and encourage nutrition policy, pricing policy, indigenous employment policy, financial reporting requirements.

To be effective, licencing requirements should be strengthened around pricing and quality, and regular licencing checks and follow up with non-compliant stores needs to be completed. A review of the Stronger Futures Act from 2016 shows the number of monitoring and assessment visits has declined, from 134 in 2013-14 to 66 in the 2015-16 financial year, however this is thought to be due to a more targeted, risk-based approach to monitoring and assessment. Based on experience of health professionals working in the NT, it seems that there is inadequate monitoring of the licensing requirements due to a combination of factors, including insufficient workforce capacity, lack of specific training (e.g. nutrition) among the workforce monitoring the requirements, and the current checklist not enabling adequate monitoring and support for stores. There are currently limited repercussions enforced for non-compliant stores, meaning stores may have little impetus to take on recommendations, so perhaps stronger penalties such as fines may also need to be introduced. If a national stores licencing standard were to be implemented, adequate funding to allow sufficient monitoring and support for stores would be vital.

**Recommendations:**

- An extension of Stores licencing to all remote communities with appropriate level of funding provided to local jurisdictions to undertake active stores licensing monitoring.
- The Australian government undertake a review of Stronger Futures in the Northern Territory Act before the act is due to end in 2022
- NIAA setup clear pathways to ensure all community members are able to exercise their consumer rights and report poor practice in remote community stores
- National Licencing Standards for remote community stores to be strengthened, and adequate funding provided for effective monitoring and enforcement processes.
  - Nutrition component of the stores licensing checklist needs to be strengthened. It is currently not clear which requirements are mandatory and which points are strategies for store consideration. The minimum requirements (e.g. for availability/variety of healthy products) is low- The standard should be increased.
  - As part of strengthening the Stores Licensing scheme, NIAA should employ qualified professionals (nutritionist/dietitians) to support the development, implementation and monitoring of food security/ stores related strategies and policy.
  - There is inadequate monitoring of the licensing requirements likely due to a combination of factors- Insufficient workforce capacity, lack of nutrition training among the workforce monitoring the requirements, the current checklist does not enable adequate monitoring and support for stores.
  - The partnership between NIAA and the nutrition workforce (Gov and NGO) needs to be strengthened to support the optimal implementation of licensing requirements.
PHAA submission on inquiry into food pricing and food security in remote Indigenous communities

- All stores should have a nutrition policy in place and adequate implementation and monitoring systems should be developed and enforced by NIAA
  - Stores are not currently held adequately accountable for a) having a nutrition policy and b) implementation of the policy. A check box on the stores licensing checklist asking whether stores have a nutrition policy in place is insufficient.
  - Consider enforcing public availability of stores nutrition policies to enable transparency for community members and to increase accountability

3. The governance arrangements for Remote Community stores

There are a variety of different governance structures in remote communities with varying levels of community involvement. Store policies have great potential to improve the availability and promotion of healthy food options to community members. Research in Western Australia with key informants reported on this potential for store policies to support healthier food choices, e.g.:

“It would be great if there was a store policy because then more things could be regulated around access to food and, you know, having healthy foods more accessible and getting a better balance between junk and healthy options, or having the healthier options of the junky food available. There is no regulation around that.”

Research also reported on perceived positive changes since the implementation of a store policy, such as greater promotion of healthy food including placing a large fridge full of cool water at the front of the store. Discussions centred around the importance of still offering community members choice but positioning healthy food front and centre.

However, it is vital that store policies are transparent and available for the community and boards/committees governing stores to hold store managers accountable to ensuring nutritious, quality, affordable food is available for the community.

It is clear from Northern Territory Market Basket Surveys that group stores have been able to achieve lower prices, greater range and better quality of healthy food (see figure 1).

Figure 1. AMSANT analysis of Northern Territory Market Basket survey results

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Structures like Arnhem Land Progress Aboriginal Corporation (ALPA) and Mai Wiru community-controlled stores groups, that operate in Queensland, South Australia and the Northern Territory, have strong community controlled governance and are able to achieve economies of scale through grouping of stores and have been a success story in remote community stores. These store groups have been able to develop employment opportunities for communities and community business governance and management skills in a way that meets the communities needs and empowers them.

The other large store group operating in remote communities is Outback Stores. This Commonwealth-owned entity manages stores on the communities’ behalf. While individual stores have Boards which receive quarterly reports from Outback Stores about their store, the community has no say regarding the operation of the wider organisation. While Outback stores was developed in 2006 to improve remote store management practices and increase employment opportunities for community members there has been little improvement in Aboriginal people employed and stores with Nutrition policies in remote stores in the Northern Territory.18

Recommendations:
● A review of Outback Stores and its governance structures. The terms of reference for this review should include:
  ○ reviewing models to transitioning Outback Stores to an Aboriginal community-controlled entity
  ○ appropriate skills and training for management roles.
● Development of buying and freight co-ops between individual community owned and operated stores to achieve a reduction in cost of healthy food through economies of scale.
● Provide support for the development and implementation of transparent mandatory store policies, in collaboration with local communities, that support greater access to affordable, quality, nutritious food.8

4. Comparative pricing in other non-Indigenous remote communities and regional centres

People living in remote areas pay the highest average price for food. Mean income levels decline and unemployment rates are higher in remote locations,24 yet food costs are higher compared with major cities. Research has consistently found that healthy food baskets cost between 20-60% more in remote areas than in major cities.20, 25, 26 In contrast, some store managers strive to ensure there is healthy, affordable, quality food in their stores. Some have commented that they have reduced the prices so they are in line with prices of the largest nearby town, so that community members were not required to travel large distances to purchase their food.

Inconsistent methodologies have been used across states to measure food costs in remote communities. Regular and sustained implementation of a consistent national food pricing survey bi-annually would facilitate timely understanding of food prices across remote Australian communities and support locally relevant strategies to improve food prices. Electronic sales data could be utilised as a data collection strategy to support this.
The best current example is the Market Basket Surveys (MBS) reporting on the affordability, availability and quality of food in remote communities and regional centres, which have been completed regularly in the NT since 2000 (annually from 2000-2017, and biennially since 2017). The current NT MBS looks at the price of 2 different food baskets - a ‘healthy food basket’ to feed a family of 6, which aligns with the recommended proportions of food groups as per the Australian Dietary Guidelines, and a ‘current diet basket’ to feed a family of 6, which is based on the reported dietary intake from each food group as per the 2012-13 National Health Survey. The NT is currently the only jurisdiction to consistently have collected and reported on this type of data. This data provides significant insight into trends in food cost and variety over time, pricing differentials between recommended and current diets, differences between geographic districts, and regional and remote locations.

Market Basket Survey data is a valuable advocacy tool, however there is currently no transparency of results – individual store data is not published, so community members and store managers are not able to compare to how their store is performing against other similar stores. Currently each store receives their own data compared to the aggregated remote district averages and local regional centre supermarket only. Participation in the Market Basket Survey is also currently optional, so store managers and committees can decline participation, which can result in incomplete data and also has potential to create selection bias (as stores with higher prices or poorer range may be more likely to decline).

A standardised protocol to assess, compare and monitor the price, price differential and affordability of healthy (recommended) and current (unhealthy) diets in Australia has recently been developed in line with the International Network for Food and Obesity / non-communicable diseases Research, Monitoring and Action Support’s (INFORMAS) optimal approach to monitor food price and affordability globally – this has been named the Healthy Diets Australian Standardised Affordability and Pricing (Healthy Diets ASAP) method. Implementing a standardised protocol such as this would support benchmarking, comparison and monitoring of all components of food security (ie. including availability, affordability, accessibility, acceptability) across remote communities, regional and urban centres nationally.

**Recommendations:**

- Federal Government to investigate subsidisation of core healthy food freight to remote communities to assist with the high freight costs.
- The Australian government to work with State and Territory counterparts to commit to develop policy measures addressing the widening gap in the cost of food in remote communities compared to regional towns.
- Introduce supply chain interventions to influence the production, manufacture and distribution of food to reduce food prices at point of purchase.
  - Implement subsidies on logistic operations (transport, freight, maintenance of stores, equipment, staffing etc.) of remote stores
  - Implement strategies to reduce the cost price of staple foods to remote stores.
A nationally standardised and validated food availability, quality and pricing survey should be completed annually across stores in remote communities and regional centres in Australia. Results should be publicly available through annual reporting to allow transparency and accountability and for comparison to occur within and between regions.

- There should be a commitment from the government on how the findings from this data will be monitored and addressed.
- The results of this survey should escalate into policies that regulate pricing of staple foods in remote communities.
- Monitoring of the surveys and results at regional level.
- AIHW may be an appropriate agency to conduct standardised surveys.

5. Barriers facing residents in Remote Communities from having reliable access to affordable fresh and healthy food, groceries and other essential supplies

The barriers facing residents within remote communities from having reliable access to affordable fresh and healthy food, groceries and other essential supplies are vast and extend beyond community store management and food pricing. Food insecurity is complex, and there are many factors which contribute. There has to be nutritious food available, which you can afford, in a shop which is open, and which you can get to and from, carrying your groceries.

Assuming you have all the ingredients for a nutritious meal, then you have to know how to prepare it, and you need access to facilities to enable you to store and cook the food. If any one of those elements is missing, the availability of ‘fast food’ will undermine the best intentions to eat well.

In remote communities food insecurity is the result of numerous underlying social determinants of health including inadequate employment opportunities, low household income and overcrowding in houses, inadequate transportation, and limited culturally appropriate education opportunities. Added to this, many families have kitchens which are not suitable for food storage and cooking, such as lack of refrigeration and power or gas supplies for stoves. Without addressing these issues there will be little improvement in not only food insecurity levels but also chronic disease rates, child developmental outcomes and infectious disease outbreaks.

Housing

A structural barrier that must be addressed is the lack of access to facilities to prepare and store food. For example, among Aboriginal people living in the Northern Territory, more than half (53%) live in overcrowded houses; 31% report living in dwellings of an unacceptable standard and wait up to 6 years for housing and 12 months for repairs.28

The AIHW health performance framework presented in 2017 found that in remote communities homes without areas for food preparation and storage had increased from 5% in 2002 to 8% in 2015.29 Furthermore, 20% of homes in very remote areas do not have facilities to prepare food.29 These numbers indicate that a key barrier is housing, with improved housing comes the ability to purchase and prepare foods beyond one meal at a time which will lead to decreased reliance on packaged foods.
Food safety is also a key barrier. Infectious gastrointestinal illnesses in children in remote communities continue to be pervasive. Presence of infectious diarrhoeas has been linked to food insecurity in children, and leads to a range of ongoing developmental issues.\textsuperscript{30} By increasing access to health hardware like functioning sinks, taps and running water, and food preparation spaces and utensils, fresh food can be washed, which will in turn decrease infectious illnesses. Cooking equipment such as pots and pans need to be available and affordable from community stores. This should be done in combination with addressing the cost of foods within communities, and will allow for remote community members to use the healthy, fresh food, groceries and other essential supplies they purchase.

### Availability

A key issue is limited availability in food outlets, with some communities experiencing scarcity in food prior to the next delivery of food, such as: “Down to the dregs in the last two to four days”.\textsuperscript{12}

The logistics of transporting food to remote communities can be impacted by flooding due to cyclones and other weather events.\textsuperscript{12} The distance that food must travel to reach some remote communities negatively impacts the quality of food, with food reportedly “unappealing” and “tasteless” by the time it arrives.\textsuperscript{12}

### Food Price

Food prices in remote communities have been described as “inflated”, e.g:

“The freight’s just enormous …I feel it’s just wrong that the people who can least afford it but most need it are charged so much for it… There’s a fruit pack with 5 or 6 pieces of fruit maximum, and that’s $13.80.”.\textsuperscript{12}

The causes of high prices include freight charges, and the reduced economies of scale for purchasing and retailing in small remote communities. However, strategies such as the application of a 20% discount on fruit, vegetables and water have been shown to increase fruit and vegetable sales by 13% in remote communities.\textsuperscript{31}

### Variety and quality

The variety and quality of nutritious foods including fresh fruit and vegetables are generally much poorer in remote community stores compared to major cities.\textsuperscript{19, 20, 25, 32} The variety of food is often limited to basic staples such as pumpkin, oranges and onions, in addition to tinned and frozen food. Some locations do not reportedly have the throughput to justify stocking a larger range of food products.\textsuperscript{12}

In contrast, take-away and convenience foods, including energy dense and nutrient poor foods, such as sweets, microwaveable or deep-fried food and sugar-sweetened beverages are readily available for people in remote communities.\textsuperscript{19, 20, 32} In some communities, soil mineral levels are very high, or there is concern about contaminated drinking water. This results in community members purchasing water or alternative beverages at the community store. Sugar sweetened beverages are often refrigerated and are therefore appealing in contrast to bottled water which may be stored on shop shelves, where it is warm. This does not encourage community members to choose the healthier beverage of water. As a result of increased junk food availability,\textsuperscript{9} the diet quality of people living in remote communities has decreased over the last three decades; the limited availability and affordability of healthy food for many Aboriginal and Torres Strait Islander families is reflected by research demonstrating that 41% of daily energy intake comes from energy-dense, “discretionary” foods,\textsuperscript{33} which provide a cheaper source of energy.\textsuperscript{34}
**Food preparation knowledge**

Two of the clearest barriers to reliable access to affordable fresh and healthy food, groceries and other essential supplies are the pricing of food, as well as people being unsure what to cook and how to cook it. If facilities for cooking are available, knowing what to do with the food to create complete meals is also important. In 2005 an Aboriginal community-controlled health organisation in New South Wales designed a program where in exchange for a $5 co-payment families would be provided with a box of fresh fruit and vegetables as well as recipes and access to cooking demonstrations. This program reduced over the span of a year visits to the local health service, rates of Otitis media, rates of Pyoderma, number of hospital attendances, oral antibiotic prescriptions, and topical antibiotic prescriptions. This clear health benefit shows the advantage of improving access to foods economically through reduced disease burden, along with community based guidance on preparation.

**Time**

Some shops are closed for periods during the day, resulting in community members needing to travel to alternative outlets, such as an outlying roadhouse, to buy food. This alternative outlet often has a reduced variety of nutritious food options, in comparison to the main store. There is significant variability in store trading hours between different remote communities, with some older data showing stores could be open for anywhere between 22 to 45 hours per week. While there is little published data on this, experience of people living and working in remote communities confirms that trading hours can still be limited in many communities, including stores being closed for 2 hours over lunch or closing prior to 5pm (which limits access for those who are employed), trading for only short periods (eg. 3 hours) on weekends or public holidays, and some community stores not trading at all on Sundays (which can mean in some cases, from 12pm on a Saturday until 9am on a Monday, entire communities cannot purchase food).

In addition, some stores are still closed without notice at the discretion of the store manager (for example, as a punitive measure in response to community disruptions) which has a profound impact on people’s ability to access food and essential supplies. Limited and unreliable store trading hours in what is often the sole retail outlet for a community quite clearly is a significant barrier to accessibility to food and essentials, and needs to be regulated to ensure communities rights to access these basic needs are protected.

**Distance to outlets**

The implications of poor food availability, limited variety, poor quality and high food prices include some community members travelling to other locations, sometimes located large distances away, simply to purchase their food. Changes to the Australian food supply are required in order to improve the nutrition of people living in remote communities.

**Income**

Further compounding high food prices, limited healthy food availability and poor quality food, are the incomes of residents living in remote communities. Income is a major determinant of food security, and can be a significant barrier to being able to afford food and other essential supplies.

In 2014–15, 52% of Indigenous Australians aged 15 and over received a government pension or allowance as their main source of personal income. The proportion of Indigenous Australians whose main source of income was a government pension or allowance was highest in remote areas, at 65% in very remote areas compared with 43% in major cities.
The Remote Area Allowance is payable to recipients of a social security pension, allowance or benefit living in remote areas, and exists to help meet some of the higher costs of living and reduced access to services associated with living in particularly remote areas.\(^{38}\) Despite this, the median personal income among Indigenous Australians decreases with remoteness, with the lowest incomes seen in very remote areas ($286) - around half (55%) the median income of those living in major cities ($513).\(^{37}\)

The average household income in remote Aboriginal households is $389 per week with a significant proportion of households reliant on social security payments for income.\(^{39}\) However, Market Basket Survey results from the NT show that over the past decade, a healthy food basket is on average 56% dearer in a remote community compared with supermarkets in regional centres.\(^{18}\) Based on the Northern Territory Market Basket Survey this would equate to 108% of the household income needed to afford an average priced healthy basket of food. In the last 10 years the cost of food in remote communities has outpaced CPI and the gap between the cost of healthy food in major towns and remote communities has widened in the Northern Territory. Despite this the Remote area allowance for social security payment has not increased in 20 years with the current fortnightly payment being just $18.20 for singles and $15.60 each for couples, with an additional $7.30 payable per dependent child.\(^{38}\) The Newstart payment, up until the recent temporary COVID-19 increase, had not increased in real terms in 25 years.\(^{40}\)

While the temporary increase in government welfare may be assisting remote community members to purchase more food during the COVID-19 pandemic, this welfare increase must be sustained to ensure everyone has enough money to purchase nutritious foods in quantities required for good health. This is one critical step which will provide significant support for remote community members to contend with the multitude of barriers they face to access affordable, quality, nutritious food.

There is a clear discrepancy between income and cost of food for Indigenous Australians living in remote communities who are reliant on government allowances. The remote area allowance needs to be significantly increased to rectify this, and should increase annually in accordance with Consumer Price Index at minimum.

**Employment**

Employment opportunities are few and far between in remote communities with up to 30% of Aboriginal people in remote communities unemployed and a further 36% not in the labour workforce.\(^{41}\) This is combined with a punitive welfare program that punishes people leading to high rates of penalties and dropping out of unemployment programs with few avenues for actual paid work.

Programs such as the Health Habitat ‘Survey and Fix’ model and using local Aboriginal environmental health programs to provide proactive maintenance of health hardware in remote communities has been shown to play an important role in ensuring people have access to functional facilities within houses and are excellent employment opportunities for local community members.

**Health implications**

As well as facing financial hardship, remote Aboriginal residents consume less fruits and vegetables, drink greater amounts of sugar sweetened beverages and carry a higher disease burden than the general population. Aboriginal people in remote communities are 1.6 times more likely to consume sugar sweetened beverages and it is well-documented that there are disparities between the health outcomes of Aboriginal people and those of the broader Australian population.\(^{42}\) Those living in remote Indigenous communities in the Northern Territory are more likely to have multi-morbidities with a high burden of nutrition related chronic conditions, including high blood pressure, chronic kidney disease and cardiovascular disease than those in non-remote areas.\(^8\) Given the remoteness, and high rates of poor
health, it is surprising that access to primary healthcare services relative to need is lowest in very remote areas for Aboriginal and Torres Strait Islander people. It is well established that significant health inequities exist for Indigenous Australians, who experience a burden of disease that is 2.3 times the rate of non-Indigenous Australians. Chronic diseases, many of which are diet-related, account for almost two thirds (64%) of the total disease burden and 70% of the gap in disease burden between Indigenous and non-Indigenous Australians. Five of the seven estimated leading contributors to the health gap between Indigenous and non-Indigenous Australians relate to diet: obesity, high blood cholesterol, alcohol, high blood pressure, and low fruit and vegetable intake.

There is significant scope for improving health among Indigenous Australians by improving dietary intakes. Nowadays, the majority of food consumed in remote communities is purchased at the local community store, with some estimates indicating this could represent up to 95% of food eaten in Aboriginal communities. It has been found that vegetable intakes are lower, while intakes of discretionary (junk) food and sugary drinks are higher among Aboriginal and Torres Strait Islander people than among non-Indigenous Australians. As the store is now the major source of people’s dietary intake in remote communities, support is required to help promote and shift market demand toward more healthy choices.

To support and encourage people to purchase and consume more healthy food from remote community stores effective community-based programs are required that adopt a multi-strategy approach, across the whole health continuum, including: preventive community interventions; public health nutrition policy actions; nutrition promotion; and quality clinical nutrition and dietetic services. National education programs such as the Aboriginal and Torres Strait Islander component of Go for 2 & 5 fruit and vegetable promotion campaign, lacked community involvement in the development and implementation and were not evaluated.

The issues around high prices extend beyond food. Especially during COVID-19, having soap and hand sanitiser unaffordable has direct and serious health implications.

**Need for nutrition workforce**

Despite this, there is currently a lack of nutrition dedicated positions, teams and programs on the ground in communities (though there are often dedicated roles relating to areas such as alcohol and other drugs or child health) which makes implementing sustainable nutrition programs difficult. Remote community store managers and workers are more likely to be skilled in running a business than in nutrition. Nationally there has been a decline in the number of Aboriginal health workers compared to population growth. In particular, it has been observed that the number of Aboriginal Health staff working in in the NT has been declining in recent years, while also nationally, recruitment and retention of the Aboriginal Health workforce is not keeping up with population growth. Within the Northern Territory there are only 16 qualified Nutrition professionals covering over 100 remote communities and no dedicated Aboriginal nutrition workforce or program despite the fact nutrition plays such a critical role in the health of communities. Currently much of the remote Public Health Nutritionist workforce is responsible for the provision of clinical dietetics services, in addition to public health nutrition related work. This results in limited capacity and resources to support remote stores.

This level of staffing is insufficient to adequately support our remote Aboriginal communities with nutrition programs to assist in prevention and management of diet-related disease. Role definitions for health staff working within Aboriginal and Torres Strait Islander communities need to be broader and include the essential role of food security work. It has been found both store-based interventions combined with health promotion had the most promising positive impacts on health outcomes.
Programs that address health issues based on community-led principles and are developed and delivered by local community members have been shown to have a greater effect on health outcomes.\textsuperscript{46} It has been identified by multiple reviews that there is a need for greater investment into a trained, well-supported and resourced Aboriginal and Torres Strait Islander nutrition workforce delivering community led interventions that increase knowledge and understanding of healthy food.\textsuperscript{46, 48, 49}

Programs such as \textit{Strong Women, Strong Babies, Strong Culture} have shown that when these programs are developed with Aboriginal people they can deliver positive outcomes for the community outside just health improvements.\textsuperscript{46, 50} Nutrition programs like \textit{Go for 2&5} have been shown to be ineffective in remote Aboriginal communities due to the lack of recognition of messages and cultural appropriateness. Programs that undertake a multi-strategy approach and are developed and delivered by communities will likely improve uptake and ensure long lasting knowledge is maintained in communities.\textsuperscript{46}

Going forwards there should be an emphasis on expanding and utilising the existing workforce at the community and council level in addressing store licencing. Environmental health officers (EHOs) are understanding of the health consequences of food insecurity, as well as having existing relationships with communities which uniquely places them to be involved in this regulation at a council level. EHOs work in a regulatory position already, and visit remote communities to ensure essential services such as sewerage and water are working effectively. As part of these visits, they visit local stores and complete food safety assessments. These food safety visits could be expanded to monitor price gouging as well as the availability of healthy fresh foods, groceries and other essential supplies. This utilisation of the existing workforce should extend to education, with food preparation education as well as healthy eating habits education designed and delivered into communities by dieticians.

\textbf{Recommendations:}

- Funding be provided for health services to employ suitably qualified nutrition professionals alongside a well-supported and resourced Aboriginal and Torres Strait Islander community nutrition workforce to develop and deliver culturally relevant, community owned nutrition programs to increase demand for healthier choices in remote community stores
- NIAA should employ qualified professionals (nutritionist/dietitians) to support the development, implementation and monitoring of food security/stores related strategies and policy.
- Training on remote stores for public health nutritionists working in remote communities
- Australian government maintain the current increase in Job Seeker payments for all Australians and increase and index the Remote Area Allowance to ensure higher cost of living in remote communities is reflected in social security payments
- Adopt a ‘housing for health’ approach in all Aboriginal communities that:
  - Supports an environmental health workforce to implement evidence-based initiatives that improve health outcomes
  - Implement a proactive housing maintenance program for remote communities that employs a local workforce and ensure community members have access to kitchen facilities that give opportunities for good food storage, preparation and serving.
  - Supports culturally led sustainable design of housing to address overcrowding and culturally appropriate food storage, preparation or serving facilities.
- The Australian government undertake reforms to community development program with Aboriginal people and organisations to support remote communities to create job opportunities and employment pathways to increase income.
PHAA submission on inquiry into food pricing and food security in remote Indigenous communities

- Strategies and support to address the root causes of financial insecurity in remote communities
  - Increased availability and funding for strategies to support families with financial planning/budgeting
  - Increased availability and funding for strategies to support families with factors impacting on financial security such as gambling, smoking, alcohol consumption.
  - Increased availability and funding for strategies to support families with social and emotional wellbeing
- Support the development and promotion of local food supply options where possible. This could increase quality, variety and decrease cost.\(^{12}\)
- Where local food supply is impractical, support food freight through government core food freight subsidies.\(^ {12}\)
- Consider a 20\% price discount on core food such as fruit and vegetables,\(^{51}\) coupled with nutrition education and other marketing strategies.\(^{31, 52}\)
- Ensure that GST is not added to the price of fresh food
- Support the installation of water bubblers/coolers adjacent to remote stores to ensure clean, cool drinking water is available free of charge to community members.
- Consult with remote communities regarding trading hours to ensure minimum standards are maintained to enable all community members to access healthy foods.
- Minimum trading hours should be regulated for remote community stores, and where a community has only one food/retail outlet, it should be open daily.
  - Considerations will need to be made for stores with only 1 manager regarding opening hours. For stores with insufficient staffing to open daily/ comply with minimum regular trading hours, the focus needs to be on adequate staffing to be able to meet these requirements.
  - Strategies to meet these requirements in the absence of adequate staffing need to be formulated and implemented by stores

6. The availability and demand for locally produced food in Remote Communities

Regional level

It was recognised in the 1999 Northern Territory Government inquiry into food prices, that to address the high cost of food within remote areas with long supply chains, greater development of agriculture and food manufacturing is required to shorten supply chains and increase the availability of food within these regions.\(^ {53}\) This was again highlighted in the 2009 inquiry into Remote Aboriginal and Torres Strait Community Stores and the 2015 white paper on developing northern Australia.\(^ {26}\)

Currently the House of Representatives have an ‘inquiry into growing Australian agriculture to $100 billion by 2030’ and this committee is also undertaking an inquiry into ‘Pathways and Participation Opportunities for Indigenous Australians in Employment and Business’. To address the need for greater production and availability of food in remote communities these three inquiries need to be connected to address the underlying issues of food insecurity through increasing supply and reducing the cost of transporting food to remote communities.
The Australian Government needs to support and engage Aboriginal people in their land use and development of economic opportunities to create greater food sovereignty for Aboriginal communities. Aboriginal people own over 50% of the land and sea within the Northern Territory and are keen to develop opportunities with Aboriginal communities in control. The Northern and Central Land Councils have worked with Aboriginal communities within the Northern Territory to develop agencies to support agriculture opportunities but require greater commitment from the Australian Government. Examples of this in action are Centrefarm projects on the Desert Springs Farm in Ali Curung and support projects, such as the work experience pilot project that aims to support local community members in gaining the skills and passion needed to develop careers in agriculture.

These employment and agriculture opportunities can lead to greater access to fresh produce and more traditional foods within stores but require improved transport infrastructure to enhance connection between production areas, markets and communities. Currently, during wet seasons, communities, stores and potential agriculture development areas are cut off from road access and have to rely on expensive alternative freight measures such as barges and planes to get supplies in and out. For great availability of locally produced food these roads must be improved to allow for economic development of Aboriginal land and easier access for supply to be delivered to remote communities.

**Community level**

Some residents in remote communities have reported wanting community gardens to support food supply. Existing sources of local foods such as native fruit trees, are often cut down when houses are built, requiring planning to ensure they are retained or replaced. Schools have also been a popular setting in which to build and manage edible gardens and have been shown to be effective in supporting cooking activities with fresh produce, have offered an opportunity to produce a variety of fresh produce and were perceived to have the potential to expand into the wider community through homes. However, barriers to garden program success have included vandalism. Further, there is limited high quality, long term evaluation of the impacts and efficacy of such programs on health outcomes and food security of community members.

The organisation Food Ladder builds climate-controlled greenhouses in remote communities in Australia and internationally, and asserts that their model offers a food security solution for individual communities, given it supports education and employment of local community members, in addition to supplying fresh produce to the local food store.

Research recommendations for increasing success and sustainability of school and community gardens have included ensuring gardens are community owned, that consultation occurs regarding garden planning, types of food grown and garden management; and that the program design is flexible and simple.

Many community members also supplement their diets with foods they pick (bush tucker), from fishing and hunting. Some of these traditional foods are highly nutritious and/or contain valuable minerals and vitamins. According to women in some communities, eating 20 green ants provides sufficient vitamin C to cover daily requirements. Support for research to assist in understanding the value of traditional foods from a scientific perspective will help to support recommendations for balanced diets. The cultural value of teaching young members of the community to go out bush and take part in these food activities is enormously beneficial to the whole community.
Recommendations:

- The Australian, State and Territory Governments to improve freight access to remote communities and economic development areas by investment in transport infrastructure such as sealing of roads and building of critically needed bridges.
- Provide opportunities for Aboriginal and Torres Strait Islander people to undertake training and gain employment within their own communities to improve food security and nutrition.8
- Support for research funding regarding the scientific value of traditional foods.
- Support local traditional food procurement practices.8

7. The role of Australia’s food and grocery manufacturers and suppliers in ensuring adequate supply to Remote Communities, including:

   a. Identifying pathways towards greater cooperation in the sector to improve supply

Under the establishment of Outback Stores executives from the major retail and supply organisations were engaged to ensure greater cooperation between the food supply freight, retail sector and remote stores were achieved. Despite these efforts the price of food in remote communities has continued to grow faster than CPI and the divide between the cost of food in major towns and remote communities has widened.

Any effort to develop greater cooperation between sectors must involve independent community owned and managed stores. These stores have the greatest difficulty gaining access to adequate and affordable healthy food and often have limited time and skill to undertake significant changes to practice without support. Currently a significant number of smaller independent stores use the major supermarket chains as their supplier, purchasing through their retail arm. While this has worked to maintain some stores it has come with difficulty when supply is restricted or online shopping limits are placed. The major retailers have also done little to support these stores and improve efficiency in ordering stock.

Freight companies have reportedly been undercutting their competitors to secure the only contract to a remote community store. They then proceed to charge extremely high freight prices because they now dominate the market. The existing company was expensive, but the pricing was fair and provided employment both in the coastal community and on the island. People who ran a business then leased a barge to reduce the cost of their supplies coming to the island. This led to “special deals” with locals and council, resulting in loss of profit margin of the original operator. That company had to lay-off staff and reduce services. The “new” barge soon increased prices and was more expensive than the original one.

Recommendations:

- Consider a ceiling price for freight, adjusting the proportion of freight mark-up depending on geographic location
- Investigate how the major supermarket chains can better support remote community stores

   b. The volume of production needed for Remote Communities

No comments
c. Challenges presented by the wet season in Northern Australia as well as any locational disadvantages and transport infrastructure issues that might be relevant

There can be issues in Store design – some stores do not have capacity to hold larger volumes of both dry and cold stock and so if roads are blocked they run out of essential items in a relatively short time. Cold chains are not optimal. Truly essential goods are prioritised when limited supplies can be delivered.

There are isolated communities that rely solely on airfreight during the wet season. The electricity supply can fail at times so stocking freezers is not the solution during the cyclone season. Facilities such as Aged Care and Community Health Centres have generators so are able to continue to operate. This is not an option for most community members. Service providers are often asked by community members to bring their own supplies when coming to the community to provide services. The prices in the stores during those months increase and there can be shortages of especially fresh foods.

d. Geographic distance from major centres

Transportation issues, as mentioned above, can mean that any distance which is not walkable presents a barrier to accessing supplies.

The systems of food distribution are also problematic and inefficient, creating unnecessary problems for food freshness and price. For example, opposite one of the QLD islands, on the mainland, there are a number of banana plantations. When in season, a bunch of bananas costs $2 - $3 at a roadside stall. These bananas are bought by the central store that supplies the local island store. The central store is 1,600 km away. The very same bananas are then shipped back over 1,600 km to be supplied to the local island store. By the time they arrive, the price is doubled if not more ($6-$7), and freshness is sacrificed due to the time taken to transport the produce 3,200km. The local island store is not allowed to purchase the bananas from the farms across the water because they are obliged to be supplied from the central store.

This inefficiency in food distribution is also evident in Western Australia; food produced in northern regions is sent to Perth and then redistributed back to where it was produced, thousands of kilometres away.¹²

8. The effectiveness of federal, state and territory consumer protection laws and regulators in:

   a. Supporting affordable food prices in Remote Communities particularly for essential fresh and healthy foods
   b. Addressing instances of price gouging in Remote Communities
   c. Providing oversight and avenues for redress

Remote community stores commonly hold a high degree of local market power due to either having the food supply monopoly, or being one of few providers to the community and surrounding areas, such as outstations.²⁶ There is currently no external regulation of pricing of food or essential items in remote stores.

Mandatory fuel price reporting has been implemented by consumer affairs and fair-trading regulatory bodies in several jurisdictions (including Queensland, Western Australia, New South Wales and the NT) in an effort to prevent price gouging, improve transparency and create increased competition in a virtual market. All fuel retailers are required to register and report their fuel prices, which are updated in real time and are publicly available to consumers via website or an app so they can make an informed choice about where to purchase fuel. If fuel prices are incorrectly reported, retailers can be reported to consumer affairs.⁵⁸
A similar model for mandatory reporting of the price of a small range of staple food products (for example, a loaf of bread, a litre of milk, a kilogram of apples, etc) in remote stores could be implemented as a measure to identify (and/or prevent) price gouging, as well as to help keep the price of core healthy food products competitive.

This pricing data could also be used for monitoring, and add to that produced by Market Basket or other food availability surveys (which include more food products as well as extra detail on quality and range of healthy food products) by providing rich information on pricing trends over time, including seasonal pricing variation, average regional prices and comparison/benchmarking against other similar stores (stores could potentially be stratified on factors such as community/market size, distance from the nearest regional centre, freight methods, etc to allow for differences in logistics). It could also highlight business models which are effective in keeping pricing competitive in the remote setting which could be used to inform and improve practices in other remote community stores.

Several stores management groups have their nutrition policies publicly available. Outback stores (OBS) is a Commonwealth owned company with an independent Board of Directors which provides consultancy for the management of remote stores on a fee for service basis. OBS was established in 2006 due to poor governance and build up on debt in remote stores and aimed to improve store management and develop greater buying power to lower prices.

OBS has a Nutrition Aim - to improve the health of Indigenous people living in remote communities by improving access to a nutritious and affordable food supply, which is underpinned by the implementation of their Health and Nutrition Policy across all stores. However this policy does not seem to be publicly available, despite one of the values of OBS being Accountability - “We are transparent and accountable to our organisation, stakeholders and each other and we do what we say we are going to do”. Communities cannot hold their store to account if they are not privy to the standards their store is expected to be meeting.

Better support for nutritional workforce would help to ensure nutrition policies are appropriate, available and implemented.

Complaint mechanisms need to be available and clear, with a variety of reporting methods, including verbal reports, being acceptable. Community members currently have limited avenues for lodging complaints or reporting feedback on food pricing and quality in remote stores. Having accessible and culturally appropriate methods of reporting back to consumer affairs/fair trade agencies is essential to allow protection of consumer rights for those living in remote Aboriginal communities. A telephone hotline is recommended, and online and written options could be provided in addition.

**Recommendations:**

- Implementation of a mandatory reporting system for pricing of staple food products in remote community stores. This information should be publicly available to consumers to improve transparency and competition in the market.
- Store nutrition policies should be publicly available so communities and key stakeholders can hold stores accountable for policy implementation
- Establish accessible and culturally acceptable means of reporting unaffordable or inadequate quality of food to consumer affairs/fair trade agencies, such as a phone hotline.
9. Any other relevant factors

The COVID-19 response in remote communities has been led by Aboriginal Community Controlled Health Organisations. This response, in conjunction with the introduction of the biosecurity areas has meant that remote communities have remained COVID-19 free. This is relevant to food security as it shows once again that handing control to community of things such as health is successful. Community led responses have been found to be highly efficient, and handing store management back to communities with ongoing support will see improved food security. Handing control back to community needs to be supported financially, and we recommend the implementation of start-up grants to support local community action to address food insecurity.
Conclusion

PHAA supports the current inquiry into food security and food pricing in remote Indigenous communities. We are particularly keen that the following points are highlighted:

1) Annual or biannual survey of food prices (possibly conducted by AIHW) are required to monitor and ensure accountability of pricing structures and discourage price gouging.
2) Workforce development to improve public health nutrition workforce and knowledge in remote communities
3) Increasing allowances in remote areas and ensuring a living wage
4) Infrastructure to improve housing and functioning kitchens
5) Develop a National Nutrition Framework that addresses food and nutrition security among Aboriginal and Torres Strait Islander people.
6) Ensure regular and representative measurement of food insecurity across Australia, particularly in rural and remote communities where residents are often underrepresented in research

The PHAA appreciates the opportunity to make this submission and the opportunity to contribute to improving food security for all Australians.

Please do not hesitate to contact us should you require additional information or have any queries in relation to this submission.

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PHAA submission on inquiry into food pricing and food security in remote Indigenous communities


