



National Food Security Strategy team  
Department of Agriculture, Water and the Environment  
CANBERRA, ACT 2601

By email: [foodsecurity@aff.gov.au](mailto:foodsecurity@aff.gov.au)

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Dear National Food Security Strategy team,

**Submission: National Food Security Strategy discussion paper**

Thank you for the opportunity to provide a submission to the Federal Government's consultation on the National Food Security Strategy discussion paper.

The Regenerative Food and Farming Alliance (RFFA) is a collective of organisations, farmers and individuals working across the Australian food and farming landscape, focused on regenerating land and accelerating the transition to a food and farming system that nourishes the health of both people and the planet. Our primary focus is on delivering a food and farming system that supports regional communities, repairs and restores farming landscapes, and provides fair and equitable access to high-quality food for all.

Together, we have engaged with over 10,000 farmers and farming enterprises and collectively have over 90,000 individual supporters from across the country, all of who are invested in supporting a better farming future for Australia.

We welcome the Federal Government's commitment to developing a National Food Security Strategy and the establishment of the National Food Council, and we remain hopeful that this process will see real outcomes delivered for all involved in the food system. We are excited by the opportunity to tackle multiple challenges together as part of this strategy, including addressing market access, dietary ill health, biodiversity loss, climate change, soil loss, biosecurity, rural mental health and regional economic resilience.

We know that business-as-usual farming and food production, which drives ever more intensive production on shrinking land, is not the solution. This submission discusses the importance of having a holistic approach to food security, food systems governance and suggests policy outcomes that could be implemented alongside the strategy development. We look forward to productively working with Government through the strategy development process.

**What is needed**

We know that building resilient landscapes and food systems is essential for the long-term prosperity of Australia, and Australian farmers have the potential to transform the food production system.

Australia needs a food and farming system that is actively restoring landscapes, sequestering carbon, renewing the soil and water cycles, rebuilding social connections for the benefit of all Australians, supporting profitable food-producing businesses, thriving and resilient people and regional communities and producing nutritious food.

We believe that these challenges can be tackled together, and policy solutions must address the root cause of the problem.

We want to see government policy that:

- Supports farmers to lead the transition to regenerative farming at scale, including programs that prioritise their decision-making capacity, health and wellbeing.
- Implements and appropriately resources programs that prioritise soil and landscape restoration
- Enables a fairer food system that ensures access to nutritious and regeneratively produced food for everyone
- Invests in regional Australia, supporting local farming businesses and communities to thrive

### **A holistic approach**

The discussion paper highlights the complex nature of the food system and notes the importance of working cross-sectorally. While we're pleased that the discussion paper recognises the interconnected nature of food security, health, economic growth and environmental sustainability, it is not clear from the paper what problem the National Food Security Strategy is trying to solve, and how the different parts of the system will work together to achieve this.

For example, there appear to be two themes emerging from the discussion paper - one that focuses on domestic food security in terms of access to abundant, affordable, safe and nutritious food, and the other that considers strategies related to do with crisis management (economic shocks, biosecurity threats, climate change, or further geopolitical instability) and future-proofing our food system to withstand these into the future. These two elements will require different solutions with different focuses, stakeholders and outcomes. There is no one-size-fits-all solution, and the strategy will need to be flexible enough to accommodate this.

To support the development of the strategy, and to help answer the question of what problem (or problems) the strategy is trying to solve, we strongly recommend that a root-cause analysis be undertaken to guide decision-making. We also strongly encourage the government to adopt a holistic decision-making framework when building the strategy. This framework provides for making decisions that ensure ecological, social, and financial needs are met in the short and long term by setting a vision for a positive future and understanding the root causes of problems faced.

### **Food Systems Governance**

Establishing effective and appropriate food systems governance for the development and implementation of the Food Security Strategy is essential if we are to see balanced environmental, health and equity outcomes alongside economic outcomes.

There are several examples internationally that could be replicated to ensure good governance is in place to support the National Food Strategy, including the [National Good Food Nation Plan in Scotland](#), where legislation sets out the requirements for the development of the plan and outlines certain ministerial accountabilities, including the types of outcomes that should be considered and targets to track progress.

A core part of this governance will be to ensure that the membership of the National Food Council is representative of the entire food supply chain, from farm to consumer, and that membership is considered through the lens of fixing the problems with the food supply chain rather than maintaining the status quo. To support transparency and build trust in the process, at a minimum, the publication of the terms of reference for the National Food Council, disclosure of topics that will be discussed at its upcoming meetings, and publication of summaries of what has been discussed in the meetings should be required. Members should also be required to disclose conflicts of interest that may arise.

Finally, part of the governance framework should include measurement that is guided by true-cost accounting. If we are to get a better understanding of how strategies are being implemented and their effectiveness, we must focus on the measurement of full costs and benefits across the supply chain. In addition, broadening the scope from productivity metrics to a whole systems approach that consists of social, environmental and economic outcomes is essential.

### **Working together**

It is important that the Federal Government recognise the important role it plays in the food system. While the discussion paper notes that collaboration will be essential, it also seems to suggest that much of this responsibility lies outside areas that the government has control over. This strategy is an excellent opportunity for the government to work alongside stakeholders from across the food and farming system to achieve outcomes. In addition, it is important to recognise the important role the government can play in implementing stabilising policy measures that would provide structure and certainty for the food system.

Cooperation between stakeholders across food and farming systems is critical to delivering a sustainable agricultural future in Australia. Collaboration is also needed to help farmers and the broader food system withstand shocks and build resilience.

In relation to timeframe, the strategy should set tangible outcomes across the 10-year time horizon, providing stability and security for stakeholders with clear objectives across the short, medium and long term, recognising that the strategy will develop and change over time. This time frame should be emboldened by a very long-term 50-100 year vision, a publicly defined and promoted narrative that will help carry the strategy over into successive governments, becoming the default food and agriculture culture - one of resilience and constant adaptation to both economic and environmental changes.

### **Defining sustainability**

The term sustainability is used widely in the discussion paper, but it is not well-defined. If it is the intention of the National Food Strategy to deliver outcomes that address the root causes of the issues our food system is currently navigating, all stakeholders must understand what is required and what

the benchmark is. Without this clarity, the food system will continue on its current trajectory, as will the damaging practices that are impacting human and ecological health.

To this end, we recommend the National Food Strategy more clearly articulate what sustainability means in relation to both on-farm and off-farm outcomes.

For us, the food and farming system can not be considered sustainable if it does not actively restore landscapes, renew soil and water cycles and build up social connections for the benefit of all Australians.

Regenerative farming should be the foundation of our food system, but without full supply chain support, it this cannot be achieved. By embedding these principles within the strategy, it provides a framework for the food and retail sectors to support, and will protect against a return to cheaper food produced by lower environmental and social standards elsewhere.

### **A false economy**

As the discussion paper recognises, Australia's food system is currently facing a number of competing challenges. In the push to produce the lowest-cost calories, the health of our food system has declined. This has created a false economy: while multinational companies dominate the food supply chain and drive down prices, this is not being passed on to the farming businesses, with many farmers being priced out of the market.

At the same time, we are seeing the impact of low-cost ultra-processed food on our healthcare system with the increasing rate of dietary ill-health. The National Food Strategy must address these concerns. The issue can be explained in these steps:

- Farmers have been caught on the 'agricultural treadmill', forced to scale up or intensify to maintain their living standards, while tens of thousands of farms have fallen off the treadmill altogether.
- This process has been driven by falling prices for farm produce, as Australia has become more reliant on imports, supermarkets have taken over grocery shopping, and households are eating more ultra-processed food.
- Outside agriculture, most of the links in Australia's food chain – from catering to retail, to animal feed, fertiliser and tractors – are dominated by a few very large companies, many of which are subsidiaries of global agri-business giants
- This extreme consolidation means farmers have little bargaining power, small firms struggle, and the biggest corporations exert a strong influence on government policy, all of which lock the food system into dysfunction.
- While consumers have benefited from lower grocery prices, the long-term squeeze on farming profits and the concentration of corporate power have had major costs, especially on rural communities and the natural environment
- Australia's resilience on a shrinking number of larger farms and a handful of major businesses is a risk to food security and resilience in a world suffering the effects of climate change and unstable geopolitics.
- Farmers trying to change their practices and cooperate, and businesses producing healthy, sustainable food, need the government to tilt the playing field in their favour.

## **Policy outcomes and recommendations**

The National Food Security Strategy must deliver for communities and the environment. Policy measures need to incentivise change and set targets for how to improve areas of the system that are causing harm.

To support this, we recommend the establishment of a Ministerial portfolio for food, responsible for the oversight and delivery of the National Food Security Strategy. We also recommend the establishment of cross-sectoral partnerships to advance regenerative food production and consumption (e.g. funding network facilitation, industry development, product and marketing innovation projects).

In relation to food production, we strongly urge the Government to incentivise farmers to change to regenerative farming methods that will see an increase in soil health, water cycle management, and biodiversity across Australian farming landscapes. In addition, funding to support food hubs, co-ops and social enterprises to diversify supply chains will be essential.

In relation to dietary health, a core element of the strategy must focus on setting targets to reduce how much ultra-processed food Australia eats, and prioritise measures that allow for greater access to nutritious food.

Some specific initiatives that support the principles outlined above are included in [Appendix A](#).

We thank you again for the opportunity to participate in this consultation. We welcome the opportunity to discuss these recommendations further and contribute our expertise to the National Food Security Strategy process.

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## Appendix A: Policy measures

### Food systems, infrastructure, and market development

- Support for buyers to develop products, procurement policies and supply networks designed around the needs of regenerative farmers.
- Support initiatives that increase health while also building markets for climate-friendly food production. A priority area is public procurement of regenerative foods for public institutions. Other areas for investment would be:
  - Food subsidy/voucher programs for low-income households that incentivise regenerative purchase
  - Information campaigns and educational programs for all ages on the health and environmental benefits of regenerative food
  - Incentives/subsidies for food retailers that support regenerative farmers
  - Support the development of point-of-sale information/labels to facilitate consumer choice
- Investment in onshore/regional processing, food manufacturing and distribution
  - This would maintain the integrity and source identification of food and fibre produced in low emissions/high sequestration systems and increase the value of food produced/exported.
  - To identify opportunities, the program could start with scoping and investment readiness funding in priority region(s), potentially with industry/investment aggregators.
  - The USDA has invested significant amounts in Regional Food Business centres, regional Food Partnerships and other more targeted investments in specific regional supply chains. On top of this, it has invested \$420mUSD in regional processing infrastructure through its “Resilient Food Systems Infrastructure Program”.
- Support the development and adoption of technologies that reduce the cost of regenerative production. For example, providing low-cost loans or grants to producers to purchase specialised equipment that enables colour sorting of grain from multi-species crops/harvests to enable marketing of single crops from those multi-crops.
- Support for buyers (food service/retail/public sector/manufacturers) to develop products, procurement policies and supply networks designed around the needs of regenerative farmers (low emissions/high sequestration farmers).
- Support initiatives that increase health while also building new markets for regeneratively produced food. A priority area is public procurement of regenerative foods for public institutions.

### Supporting practice change, education and training

- Offering tax incentives for farmers with regenerative production systems
- Support the rollout and access to ecological monitoring, verification and benchmarking for farmers and land managers.

- Provide or enable long-term, low-cost financing for regenerative farmers that promotes conservation and sequestration practices on farms
- Provide investment into industry structural adjustment packages that incentivise landholders in marginal production zones to transition to more climate-resilient and carbon-positive production systems (eg, cropping to perennial pasture; or the integration of production trees into a grazing system (silvopasture)
- Implementing a national training and education program targeting farm productivity, soil health and soil carbon (modelled on the highly successful FarmBis Initiative)