



18 July 2024

Regional Development

Department of the Chief Minister and Cabinet

Via email: [CMC.RegionalDevelopment@nt.gov.au](mailto:CMC.RegionalDevelopment@nt.gov.au)

To the NT Remote Stores Program,

Thank you for the opportunity to provide feedback about the draft Standards for the NT Remote Stores Program. Central Australian Aboriginal Congress (Congress) is a large Aboriginal Community Controlled Health Service (ACCHS) based in Mparntwe (Alice Springs). Established 50 years ago, Congress is one of the most experienced organisations in the country in Aboriginal health, a national leader in primary health care, and a strong advocate for the health of our people. Congress delivers services to more than 17,000 Aboriginal people living in Mparntwe and remote communities across Central Australia including Ltyentye Apurte (Santa Teresa), Ntaria (Hermannsburg), Wallace Rockhole, Utju (Areyonga), Mutitjulu, Amoonguna, Imanpa, Kaltukatjara (Docker River), and Yulara.

We have responded to the questions raised in the Food Security Standards Discussion Paper based on our extensive experience of delivering comprehensive primary health care including multidisciplinary clinical care; health promotion and disease prevention programs; and action on the social, cultural, economic, and political determinants of health and wellbeing. This work has led us to develop a [Position Statement – Food Security](#). Congress is also an active participant of the Coalition for Healthy Remote Stores and recommendations included below are guided by community members, Congress Board members, and field experts, and are evidence-based.

## **Range of Food, Drink and Grocery Items and Schedule A**

**Do you think that the minimum range of product types listed in Schedule A will meet the nutritional and household needs of the remote communities they service? If no, what should they be and why?**

Congress' Dietitians have provided dietetics services to a number of the remote communities that Congress serves, and routinely work alongside community members to identify healthy options, including healthy 'swaps' at their local community store. Given their experience, they highly recommended that the following product types are included in Schedule A:

- Low salt option (rather than full added salt option) for tinned foods, particularly those under:
  - Legumes (shelf stable packaged or tinned): Baked Beans +1
  - Vegetables (shelf stable packaged or tinned)
  - Meat or seafood or vegetable meals (shelf stable or frozen)
- Flavouring options – i.e. herbs and spices/low salt seasoning options, as an alternative to salt to flavour foods: Minimum 3 varieties

It is very important that nutritious convenient snack or 'ready-to-go' food options are available in remote stores. It is noted that Schedule A outlines that for the takeaway meals (if provided by any store classification) a minimum of 50% of total hot bain marie / warm food offered for sale must be healthy food. In addition, a minimum of 50% of cold food (e.g. sandwiches/rolls/bakery goods/wraps) offered must also be healthy. In this Schedule there is no outline of what constitutes a 'healthy option' and Congress is therefore concerned that there is not a wider understanding of this broad category. In

order for 'healthy options' to be truly available, resources and guidelines to support remote stores to provide these options will be required. In addition, review and monitoring of the 'healthy options' would be required. Consider a rotating menu developed and endorsed by NT-based dietitians to support remote stores to reliably deliver on this product type.

In addition, the inclusion of appropriate footwear\* in Schedule A is a cost-effective health prevention strategy. People with diabetes at risk of foot ulceration need to protect their feet from external stress, including direct trauma, peak plantar pressure, repetitive stress from weight-bearing activity, and heat/cold stress from ground surfaces. Timely access to appropriate, well-fitting footwear is essential, as walking barefoot can be harmful and result in foot ulceration or external/mechanical trauma to the foot, which can lead to hospitalization and, at worst, lower limb amputation. Aboriginal and Torres Strait Islander people with diabetes are 38 times more likely than non-Indigenous Australians to undergo a major amputation and 27 times more likely to undergo a minor amputation. Equitable access to appropriate footwear in remote communities is critical when Aboriginal people have such disproportionately high rates of diabetes-related lower limb amputation. Work has been undertaken alongside AMSANT and remote community stores to determine the feasibility of stocking footwear in remote stores (Attachment 1), with ALPA, Outback Stores and TAH Northern Trading, having given in principle support to improve the supply and access of appropriate footwear.

**Are the range of products required for each store classification (Basic, Small, Medium, Large) appropriate for those store sizes? If not, what should they be and why?**

Congress' Joint Remote Health Board have advocated for action to address the impact of food insecurity and the intake of unhealthy food in their remote communities (Attachment 2). Key strategies recommended by the Joint Health Board include that remote community stores implement a number of volume and placement restrictions for unhealthy foods, and provide:

- A minimum of 10 fresh fruit and 15 fresh vegetable varieties

This should be applied to all store classifications as there is clear evidence that shows that people who eat a broader variety of fruit and vegetables have enhanced immune, gut, bone, and cardiovascular health, as well as a reduced cancer risk<sup>1</sup>. Variety in fruit and vegetables intake is as important as quantity for disease prevention.<sup>2</sup> Greater variety is recommended for preventing and managing chronic conditions as variety improves diet quality and nutritional adequacy through increasing exposure to a wider range of nutrients and phytochemicals essential for supporting normal physical functioning.<sup>3,4,5</sup>

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<sup>1</sup> Slavin JL, Lloyd B. (2012). Health Benefits of fruits and vegetables. *Adv Nutr*, 3(4): 506–16

<sup>2</sup> Conklin, Annalijn I et al. "Variety more than quantity of fruit and vegetable intake varies by socioeconomic status and financial hardship. Findings from older adults in the EPIC cohort." *Appetite* vol. 83 (2014): 248-255. doi:10.1016/j.appet.2014.08.038

<sup>3</sup> Drescher L.S., Thiele S., Mensink G.B.M. A new index to measure healthy food diversity better reflects a healthy diet than traditional measures. *The Journal of Nutrition*. 2007;137(3):647–651. March 1

<sup>4</sup> Foote J.A., Murphy S.P., Wilkens L.R., Basiotis P.P., Carlson A. Dietary variety increases the probability of nutrient adequacy among adults. *The Journal of Nutrition*. 2004;134(7):1779–1785.

<sup>5</sup> Healthy food retail in remote NT communities identified as top priority - Media release. 13 March 2023. Deakin University

\*Appropriate footwear can be considered as either of the following:

**For open toe sandals** with adjustable ankle strap and slip resistant sole. To reduce the risks of sharp object entering the foot it essential that sole of the footwear stocked is able to resist penetration through the midsole

**For closed toe sneakers (worn with socks)** with adjustable fastening (such as Velcro/ laces). To protect the feet from heat and cold, dropped objects, side impact, and sharp objects under foot. Sole of footwear should also be able to absorb impact from body loading.

## Store Classification

**Are the proposed Store Classification Criteria in Table 1 valid, or do they need changing? If they need changing, what should they be and why?**

The concurrent work being undertaken in the National Strategy for Food Security in Remote First Nations Communities indicates that takeaway outlets should be included in any food security strategy. The draft discussion paper for the National Strategy highlights the importance of ensuring that “takeaway outlets are included in food security strategies to ensure better nutrition outcomes for communities.” Congress therefore strongly recommends that the NT Remote Stores Program align with this overarching review, as takeaway stores are considered to be important providers of food in remote communities in the Territory. Not including takeaway outlets in this program will present an unfair advantage to these providers, and will impact the viability of the remote stores that are included under the program’s conditions.

To mitigate this and ensure that takeaway outlets are included under the NT Remote Stores Program, Congress recommends the following strategies which have been outlined by the Coalition for Healthy Remote Stores and include options to:

1. Modify the text of what constitutes a community store to be ‘a significant source of food, drink OR groceries’ (rather than AND).
2. Have an additional classification of store called *Convenience store and Takeaway* where primarily ready to eat meals and drinks are stocked.
3. Allow takeaways to be included as a *Basic Store* and then apply for an exemption of grocery items as per Schedule A.
4. Require Basic Stores, Convenience Stores and Takeaways to only meet the product type requirements for product types stocked (e.g., if the store or takeaway stocks shelf stable vegetables, the minimum of 3 lines would apply, but if this product type was not stocked, the there would be no requirement to stock these products).

## Pricing and Affordability

**What strategies could the NT Government feasibly implement to support more affordable food, drink and grocery items in remote communities?**

A direct to consumer, point of sale subsidy is required to address financial barriers and increase affordability of essential food, including fruit and vegetables, in remote areas funded by at least a 20% tax on sugar, including but not limited to all sugar-sweetened beverages. The impact on additional food cost for unhealthy foods must be offset through hypothecating the tax to implement a subsidy to directly reduce the cost of fresh fruit and vegetables so there is a shift to these healthy foods at no additional cost for people on low incomes. Health promotion and interventions to increase fruit and vegetable consumption are needed to address the financial barriers that might limit the uptake of such dietary advice. This will help to ensure that the overall impact of the tax on a remote household food budget is positive and not negative which is key to addressing the social gradient that exists in food security. A tax, at least on sugar-sweetened beverages, would be in line with the recommendations provided as a part of the finding by the Standing Committee on Health, Aged Care and Sport’s Inquiry Into Diabetes, released on 3 July, 2024:

#### **Recommendation 4**

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- 3.181 The Committee recommends that the Australian Government implements a levy on sugar-sweetened beverages, such that the price is modelled on international best practice and the anticipated improvement of health outcomes. The levy should be graduated according to the sugar content.

There is a unique opportunity to implement these recommendations in a timely manner and Congress strongly recommends the adoption of this recommendation as a part of the NT Remote Stores Program.

Congress supports that all community stores continue to be required to participate in the NT Department of Health's bi-annual Market Basket Survey. The Market Basket Survey provides invaluable information on the cost, availability, and quality of basic food items in remote stores, and is essential in understanding the affordability of healthy foods across all areas of the Territory.

### **Promotion of Good Nutrition and Healthy Products**

**Do you think the draft Standards and the promotion of good nutrition and healthy products will be effective in supporting the Closing the Gap outcomes? Please provide reasons why or why not.**

Congress commends the NT Government for including the following two community-supported, evidence-informed key policy asks of the Coalition for Healthy Remote Stores as Standards. This includes that:

Each store must reduce sugar intake:

- There should be no placement of any sugar sweetened soft drinks of more than 600ml in size in refrigerators when being offered for sale.
- Less than 50 per cent of all refrigerator facings are to be used for sugar sweetened beverages.

Studies have shown that nearly half (46%) of household expenditure on food and drinks in remote Australian Aboriginal communities was on products categorized as "discretionary" in the Australian Dietary Guidelines (commonly sugar-sweetened beverages, takeaway foods such as pies and pizza, confectionary, biscuits, and potato crisps)<sup>6</sup>. As such, Congress stresses that, in line with the recommendations provided by the Joint Remote Health Board (Attachment 2) there should be *no promotions on unhealthy food and drinks*. This means that the proposed Standard of "the majority of store promotional activity carried out must be on healthy food and products" is insufficient to address high consumption of discretionary foods. The Healthy Stores 2020 study in remote community stores has shown that restrictions on product placement and price promotions of unhealthy foods and drinks resulted in 1.8 tonnes less sugar being sold over 12 weeks across 10 stores, while not impacting store profits<sup>7</sup>.

Close monitoring to establish effects, and evaluation to understand impact on Closing the Gap outcomes, would be essential to implementing the Standards and promotional strategies, with

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<sup>6</sup> Bryce S, Scales I, Herron L-M, Wigginton B, Lewis M, Lee A, Ngaanyatjarra Pitjantjatjara Yankunytjatjara (NPY) Women's Council. Maitjara Wangkanyi: Insights from an Ethnographic Study of Food Practices of Households in Remote Australian Aboriginal Communities. *International Journal of Environmental Research and Public Health*. 2020; 17(21):8109. <https://doi.org/10.3390/ijerph17218109>

<sup>7</sup> Brimblecombe et.al (2020). Policy actions for healthy stores in remote Aboriginal and Torres Strait Islander communities in Australia, Healthy Stores 2020, Monash University.

adjustments made as needed. Congress, as a part of the Coalition for Healthy Remote Stores recommends that the NT Remote Stores Program develop a monitoring and evaluation system that:

- a. streamlines data collection including the use of tools such as the Market Basket Survey
- b. ensures continuous improvement in the Program and its operation,
- c. routinely reports on the outcomes of the Program in achieving its aims,
- d. establishes compliance, with mechanisms that support stores to achieve Program conditions, and;
- e. is flexible to incorporate future opportunities, such as participation in an annual benchmarking approach with a dashboard where non-identifiable Program data are publicly available to increase transparency and promote use of available data.

In their current form, it is not clear how the Standards support the Closing the Gap outcomes for Aboriginal employment. The Aboriginal workforce, as well as Aboriginal Community-Controlled Organisations, are essential to ensuring best outcomes are achieved and that health initiatives are relevant and culturally appropriate for their communities. Aboriginal employment also supports good health and wellbeing, and broader capacity strengthening of the community. Health initiatives work best when the communities they impact on are able to participate in their development, particularly if there is a defined goal the community wants to achieve. Therefore, mechanisms to support transition stores to Aboriginal community control should be considered and promoted.

### **What other initiatives do you think could effectively promote good nutrition and healthy products in Community?**

The Healthy Stores 2020 project<sup>7</sup> highlighted that in remote Australian Aboriginal communities, the availability and display of food can impact what people buy. The greatest impact observed in association with Healthy Stores 2020 overall was the reduction in targeted beverages, particularly soft drinks.<sup>7</sup> Therefore, Congress, along with the Coalition for Healthy Remote Stores, continue to advocate for the adoption of the following strategies into policy:

- No promotional activity on unhealthy food and beverages, including no price promotions or discounts, no volume promotions (e.g., 2-for-1 deals), and no other display material (e.g., posters, shelf stripping).
- No availability of unhealthy food and beverages in high traffic areas, including store entrance, checkout area and counter, and front-, between- and end-of-aisle displays (except where infrastructure/situations prevent this).

Additionally, strategies to promote good nutrition and healthy products could include:

- Advertising for healthy option comparison, such as labels outlining how much sugar is in products and promoting water as best choice
- Ensuring items are placed near their cost labels to enable informed decisions
- Developing and promoting family food packs such that all ingredients ready in a box with a recipe on how to prepare the healthy meal.

Health promotion activities should ensure there is capacity for smaller regional campaigns relevant to specific communities, regions, or areas to ensure that they remain relevant and culturally appropriate.

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<sup>7</sup> Brimblecombe et.al (2020). Policy actions for healthy stores in remote Aboriginal and Torres Strait Islander communities in Australia, Healthy Stores 2020, Monash University.

## **Ensuring Continued Viability**

**Will the proposed draft Standards be effective in monitoring store viability, and, if not, what do you think should be included in the Standards?**

It is likely that tailored support will be required to maintain store viability, promote business growth, promote Aboriginal employment, ensure that stores are responsive to community recommendations, and to meet community expectations.

**What support do you think remote community stores need to be more sustainable?**

There is a need to support mechanisms for achieving an economy of scale store model to assist independent stores in accessing supplies, cheaper prices and discounted freight.

With kind regards,

Donna Ah Chee

Chief Executive Officer