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Citation: Carey, R., Caraher, M., Lawrence, M. and Friel, S. (2015). Opportunities and challenges in developing a whole-of-government national food and nutrition policy: lessons from Australia's National Food Plan. *Public Health Nutrition*, 19(1), pp. 3-14. doi: 10.1017/S1368980015001834

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Opportunities and challenges in developing a whole-of-government national food and nutrition policy: lessons from Australia's National Food Plan

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Submitted 11 September 2014; Final revision received 16 March 2015; Accepted 29 April 2015

Abstract

Objective: The present article tracks the development of the Australian National Food Plan as a 'whole of government' food policy that aimed to integrate elements of nutrition and sustainability alongside economic objectives.

Design: The article uses policy analysis to explore the processes of consultation and stakeholder involvement in the development of the National Food Plan, focusing on actors from the sectors of industry, civil society and government. Existing documentation and submissions to the Plan were used as data sources. Models of health policy analysis and policy streams were employed to analyse policy development processes.

Setting: Australia.

Subjects: Australian food policy stakeholders.

Results: The development of the Plan was influenced by powerful industry groups and stakeholder engagement by the lead ministry favoured the involvement of actors representing the food and agriculture industries. Public health nutrition and civil society relied on traditional methods of policy influence, and the public health nutrition movement failed to develop a unified cross-sector alliance, while the private sector engaged in different ways and presented a united front. The National Food Plan failed to deliver an integrated food policy for Australia. Nutrition and sustainability were effectively sidelined due to the focus on global food production and positioning Australia as a food 'superpower' that could take advantage of the anticipated 'dining boom' as incomes rose in the Asia-Pacific region.

Conclusions: New forms of industry influence are emerging in the food policy arena and public health nutrition will need to adopt new approaches to influencing public policy.

Keywords

Australia
National food and nutrition policy
Integrated food policy
Policy analysis
Industry lobbying

Nutrition is now the main risk factor influencing the burden of disease globally⁽¹⁾. In response, there are calls for 'inter-sectoral' food and nutrition policies that address the social, environmental and health dimensions of food systems, and that emphasise cross-government coordination and broad stakeholder participation in policy development⁽²⁾. However, there are challenges in developing such policies due to the complexity of the issues and the tensions between sectoral interests⁽³⁾.

The purpose of the present article is to critically analyse the development process for the Australian National Food Plan (also referred to as 'the Plan' hereafter) as a case study of contemporary food and nutrition policy making.

The processes of consultation and stakeholder involvement in the development of the Plan are addressed, as is the power exerted by various industry groups. The article ends by exploring the fate of the Plan after a change in federal government in late 2013.

Background

The declaration of the International Conference on Nutrition and commitments to the World Food Summit in 1992⁽²⁾ obligated national governments to develop and revise National Plans of Action for Nutrition. A key



69 message from the 1992 commitments was that plans
70 should be inter-sectoral, placing nutrition in the context of
71 broader food system influences on consumption, and
72 involving all relevant government departments in the
73 development of plans, including departments of agri-
74 culture and trade, as well as health. In practice, countries
75 have continued to develop separate nutrition policies
76 alongside food security and/or agricultural plans^(2,4).
77 These developments have been led by national govern-
78 ments, although as civil society and consumer concern
79 about the global food system has grown, this has led to
80 increasing involvement of other stakeholders in the
81 development of food policies^(5,6).

82 Prior to the 2013 National Food Plan, there had been
83 several attempts in Australia to develop 'inter-sectoral'
84 food and nutrition policies at national⁽⁷⁾ and state level^(8,9).
85 In particular, the 1992 national food and nutrition policy⁽⁷⁾
86 was far-sighted in its statements that 'the food and nutri-
87 tion policy needs to be wide ranging and to ensure that the
88 impacts of individual programs are examined throughout
89 the food and nutrition system' and that 'the food and
90 nutrition policy acknowledges the importance of ecological
91 sustainable development so that resources are managed to
92 ensure good health for future generations'. However, the
93 policy received little support for its implementation and
94 foundered. State food policy initiatives were also domi-
95 nated by agricultural and food industry interests⁽¹⁰⁻¹²⁾.
96 Australia is a significant food producer, exporting
97 about 60 % of the food that it produces⁽¹³⁾. Related to this
98 export focus, over the last three decades, food policy
99 in Australia has been characterised by an emphasis on
100 agricultural and trade policy and by a neoliberal, market-
101 driven agenda⁽¹⁴⁾.

102 In 2009, both the public health sector and the food
103 industry released position papers calling for the develop-
104 ment of a national food policy^(15,16). The position
105 statements released by the Public Health Association of
106 Australia (PHAA)⁽¹⁶⁾ (the peak body for the Australian
107 public health sector) and the Australian Food and Grocery
108 Council⁽¹⁵⁾ (the peak body for the food manufacturing
109 sector) differed in many respects, particularly in their
110 relative emphasis on health and trade concerns. However,
111 both called for an 'integrated' or 'whole of government'
112 policy that included all relevant government departments
113 in its development and both also highlighted concerns
114 related to future environmental challenges for food
115 production. Shortly after the Labor Government was
116 re-elected in late 2010, it announced that it was beginning
117 work on a National Food Plan that would 'integrate all
118 aspects of food policy by looking at the whole food chain,
119 from the paddock to the plate'⁽¹⁷⁾. Carcasci's research⁽¹⁸⁾
120 suggests that the release of the *Food Matters* report⁽¹⁹⁾
121 by the UK Cabinet Office in 2008 was influential in the
122 Australian Government's decision to develop a National
123 Food Plan, along with the Australian Food and Grocery
124 Council's position paper⁽¹⁵⁾.

Methodology

The present article uses a critical policy-based research
approach, drawing on analysis of a variety of policy
documents from key stakeholders relating to the develop-
ment of Australia's National Food Plan⁽²⁰⁾. The document
analysis focuses on the chronological stages of the develop-
ment of the National Food Plan, identifying the key actors
that influenced the Plan's development. We also describe
how the National Food Plan was shaped by the interests of
those key actors and by the broader policy context in which
the development of the Plan took place.

Data collection

Data were collected from a range of policy documents
at three key stages of the policy development process.
The three stages of policy development were typical of a
'Westminster' policy process. An issues paper was
released by the Government, then a green paper and a
final white paper, with public consultations at the first two
stages of the process when stakeholders were invited to
make submissions (see Fig. 1).

The following types of documents were collected:
(i) government discussion papers (the issues paper, green
paper and white paper); (ii) stakeholder submissions to
the issues paper and green paper; (iii) position papers and
other policy documents from stakeholders related to the
development of the Plan; and (iv) media releases from
government and other stakeholders about the Plan. All the
documents collected were publicly available. Submissions
to the issues paper and green paper were downloaded
from the website of the Department of Agriculture, Fisheries
and Forestry (DAFF), the lead government agency in the
development of the Plan (see below). The submissions
have since been archived and are no longer publicly
available. Government discussion papers were also
downloaded from the DAFF website. Other documents,
such as media releases and position papers, were down-
loaded from the websites of key stakeholders. In addition
to documents related to the three key stages of the policy's
development, information about other aspects of the
policy development process – such as the establishment of
the National Food Plan Unit and the Food Policy Working
Group – was also gathered from the DAFF website.
Documents were collected between June 2009, when
stakeholders began calling for the development of a
national food policy, and May 2013, when the final version
of the National Food Plan was released.

Data analysis

Analysis of data in the present research draws on two
analytical approaches: Walt and Gilson's⁽²¹⁾ health policy
triangle and Kingdon's⁽²²⁾ policy streams model.

Walt and Gilson's health policy triangle⁽²¹⁾ was used as
an organising framework to analyse how the Plan was

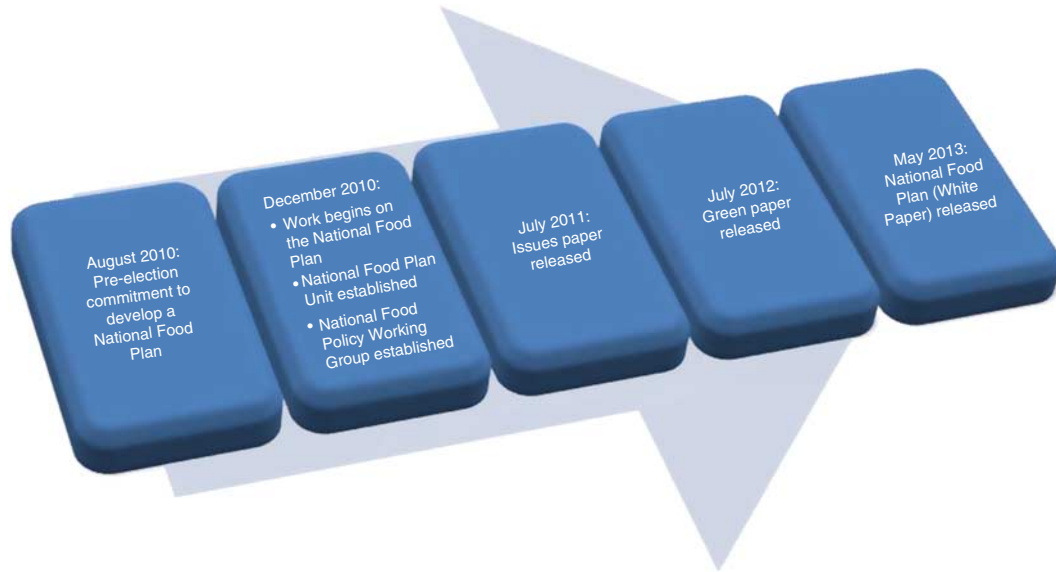


Fig. 1 Stages of development of Australia's National Food Plan from August 2010 to May 2013

developed and who was involved in its development (see Fig. 2). The policy triangle approach explores the role of actors informed by the context, process and content of policy development⁽²¹⁾ and enables a generalized map of a policy area to be developed to aid systematic thinking⁽²³⁾. This structure was used to organise and filter the documents gathered, first chronologically, then based on actors and stakeholder interests and positions. As Walt *et al.*⁽²⁴⁾ observe, policy analysis is a multidisciplinary approach 'that aims to explain the interaction between institutions, interests and ideas in the policy process' (p. 308). We would add that it is also multilevel in that interests and institutions operate at different levels in the policy world, from local to national. This is the case in Australia, which is a federation of states and independent territories with a parliamentary 'Westminster' system of government.

The perspectives of multiple researchers aided the development of a critical understanding of the policy process. Submissions to the public consultations for the National Food Plan were read by two of the researchers and an initial categorisation was made of the actors, sectors and interests that they represented. The two researchers then cross-checked their findings and further refined the categories. The results of this categorisation were read at a later stage by the two other authors. This informed the process of identifying the sectors that made submissions to the policy development process and the key actors within those sectors who were representative of the interests and tensions identified. We identified actors using the tripartite approach to food supply advocated by Lang and Heasman⁽²⁵⁾ of three key actors: civil society, the private sector and government.

Walt and Gilson's⁽²¹⁾ framework was augmented using Kingdon's⁽²²⁾ 'policy streams model'. Kingdon argues that for a new policy to be developed and implemented, three

different policy streams need to converge – problem, policy and politics – to create an active policy window, in which a new policy can be formed and implemented. Policy making is messy, with evidence playing one part and lobbying and vested interests shaping the eventual policy⁽²²⁾. Drawing on the comparative work of Zahariadis⁽²⁶⁾, Cairney⁽²⁷⁾ argues that the strength of this multiple streams approach to understanding policy decisions is in its 'explanatory power' (p. 240). Kingdon's model allows the overall policy context to be explored, so that events beyond the submissions in terms of the politics of the time are used to frame the developments of the policy. This does not necessarily mean that the correct policy decisions are always reached, but that we can look to underlying influences beyond evidence in the process of food policy making⁽²⁸⁾. It is for this reason that Kingdon's approach is used as a framework for analysis. In the context of the present research, the potential points at which the policy 'streams' could overlap were the three key stages of the policy development process: the initial issues paper and the green and white papers.

Cairney⁽²⁷⁾ suggests that the most efficient process for analysing public policy is twofold. First, mapping the policy development process provides a direction of travel for research. Initial mapping of the process was undertaken through policy scoping and document review, which identified relevant documents and drew out themes for analysis. The development of the Plan then became a case study of influence and an example of what Bell⁽²⁹⁾ calls 'policy story-telling'. The present article analyses the how of the policy processes and who (which actors) have been involved in the development of the process. We move from the general to the specific, using a case study approach, to show how key actors were involved in the process of influence.

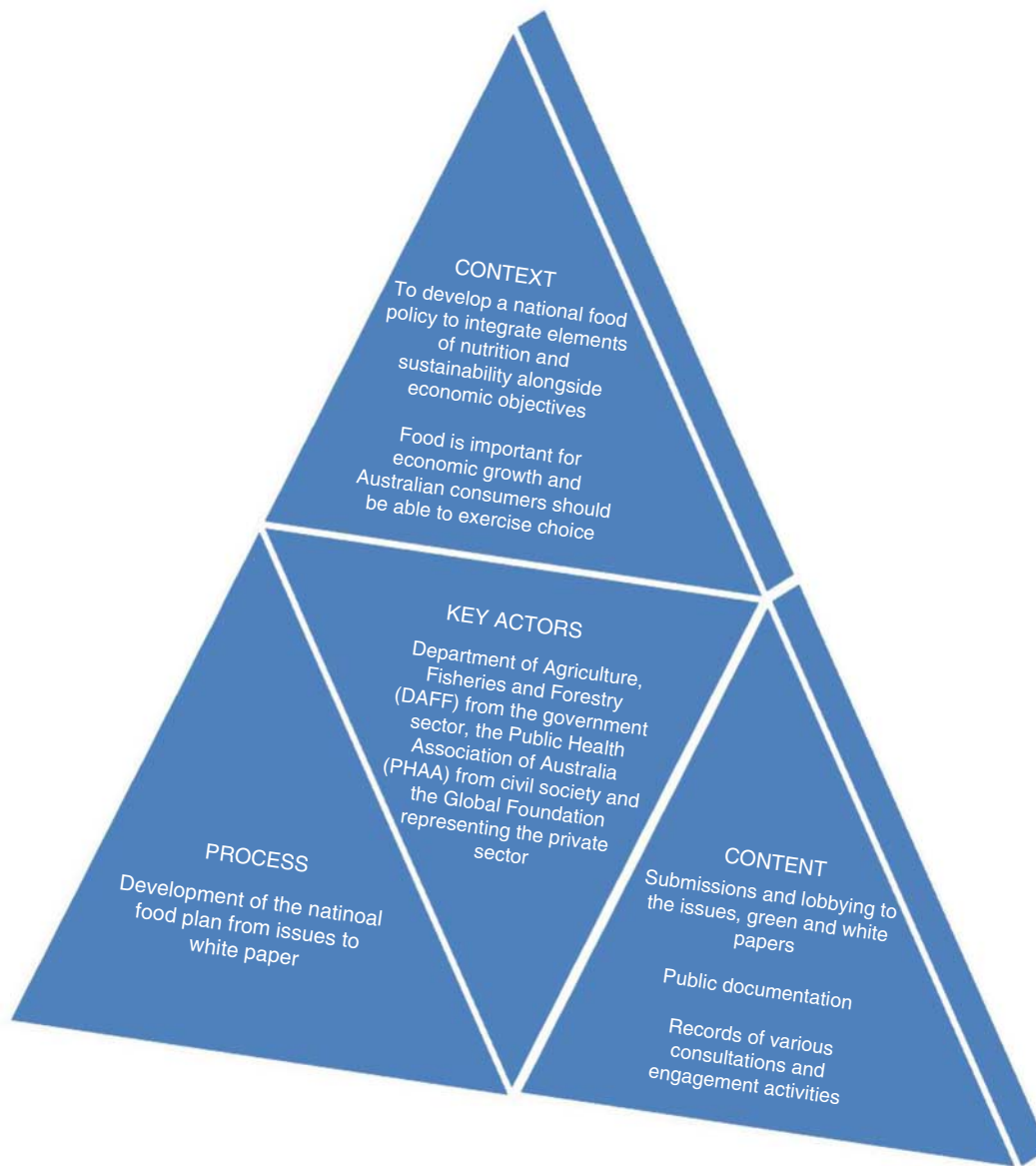


Fig. 2 The policy triangle as applied to the development of Australia's National Food Plan (adapted from Walt and Gilson⁽²¹⁾)

Key actors

Walt *et al.*⁽²⁴⁾ highlight that within health policy analysis 'it can be difficult to "tell the story" without getting immersed in the detail' (p. 310). In order to address the risk of getting lost in the complexity, we chose to focus on the activities of one key actor representing each apex of the policy triangle: the DAFF from the government sector, the PHAA from civil society and the Global Foundation from the private sector (see Table 1). The three policy actors were chosen on the basis of their role in the development of the Plan.

DAFF was chosen as a government actor because it was the lead federal government agency involved in the development of the Plan (see Results section). Australia is a federal nation, and the federal and state governments share responsibility for aspects of health, environment and

agricultural policy. As a result, there are both horizontal and vertical policy streams between the federal government and the states, as well as across states. The development of the National Food Plan was led by DAFF (the federal department for agriculture) and individual states made submissions during the consultation process.

The PHAA was chosen as the key civil society actor because it is the national peak body for public health in Australia and played a significant role in advocating for the development of an integrated national food policy, with nutrition and sustainability as a central focus^(16,30).

The Global Foundation was chosen as the key private sector actor because of the significance of its activities in relation to the development of the National Food Plan (see Results) and because of the involvement of some of Australia's most powerful food industry stakeholders in

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Table 1 Key actors in the development of Australia's National Food Plan

Actor	Sector	Summary
Department of Agriculture, Fisheries and Forestry (DAFF)	Government	The federal department with responsibility for leading the development of the National Food Plan under the direction of the Minister for Agriculture, Fisheries and Forestry See http://www.daff.gov.au
Public Health Association of Australia (PHAA)	Civil society	The Australian association for public health professionals See http://www.phaa.net.au
Global Foundation	Private sector	A civil society organisation funded by the private sector See http://www.globalfoundation.org.au

these activities. The Global Foundation is a registered charity with links to key stakeholders in the private sector. The Global Foundation established a Food Security Working Group in 2009 that included representatives of Woolworths (one of Australia's two main retailers), the Australian Food and Grocery Council (the national peak body representing food manufacturers)⁽³¹⁾, the National Farmers' Federation (the national peak body representing farmers) and the CSIRO (Australia's national science agency)⁽³²⁾.

Many other actors were involved in the development of the Plan, and this can be seen in the several hundred written submissions received on the issues paper and the green paper. Although we focused primarily on three key actors, we also drew on wider sources and documents from other actors. These actors are introduced in the Results where relevant.

Results

Policy development process

The National Food Plan was developed over two-and-a-half years between December 2010 and May 2013. The development of the Plan is described in terms of three key stages: the Issues Paper, Green Paper and the finalised White Paper. Prior to the Plan's development, a National Food Plan Unit was established to lead the development of the Plan within Government and a National Food Policy Working Group was set up to advise on its development. These are also described.

The National Food Plan Unit and the National Food Policy Working Group

A National Food Plan Unit was established to coordinate development of the Plan under the leadership of the Minister for Agriculture, Fisheries and Forestry. The Unit was based in the Agricultural Productivity Division of DAFF. The Minister for Agriculture, Fisheries and Forestry was said to be 'working closely with relevant ministerial colleagues to ensure a whole-of-government approach' to the development of the Plan⁽³³⁾. However, the location of the National Food Plan Unit within the federal department of agriculture stood in contrast to the development of the

UK's integrated food policy, Food 2030⁽³⁴⁾, which was coordinated directly by the Prime Minister's Cabinet Office⁽¹⁹⁾. The decision to locate the National Food Plan Unit within DAFF was an early indicator of the direction that the Plan would take.

A National Food Policy Working Group was set up in December 2010 'as a forum for active communication between the food industry and government'⁽³⁵⁾. Of the thirteen members of the Working Group, ten were from the agriculture and food industries; there was just one consumer representative and one health representative. Some of the most powerful stakeholders in the agri-food sector in Australia were represented on the Working Group, including the National Farmers' Federation, the Australian Food and Grocery Council and Woolworths (one of two major food retailers in Australia, the other is Coles). These organisations were also key members of the Global Foundation's Food Security Working Group⁽³²⁾.

The dominance of agriculture and food industry representatives on the Working Group led to criticism from the health sector that the working group was 'stacked with industry'⁽³⁶⁾ and concerns that health, consumer and environment advocates had effectively been 'locked out' of the key policy forums. There was also criticism that there was a lack of transparency in the activities of the Working Group, as the agendas and minutes of meetings were not made public⁽³⁷⁾.

The sectors that were under-represented in the National Food Policy Working Group responded in several ways. A number of grass-roots civil society groups came together after the August 2010 pre-election announcement to write an open letter to politicians, expressing their concern that the development of the policy should be an open and democratic process that reflected the interests of all Australians. Many of the signatories of this letter went on to form the Australian Food Sovereignty Alliance, which became a significant civil society actor in the national food policy arena, developing an alternative policy framework to the National Food Plan, The People's Food Plan⁽³⁸⁾.

The Issues Paper (June 2011)

The Issues Paper presented a view that Australia was essentially 'food secure', emphasising that 60% of the

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country's food production was exported. The overall emphasis of the Issues Paper was on maximising food production and promoting a 'competitive, productive and efficient food industry'⁽³⁹⁾. This view was criticised by academics, civil society and public health stakeholders, who argued that a fundamental shift was needed to a fair, sustainable and healthy food system^(40–42). The criticism came in the form of policy position papers⁽³⁷⁾ and media releases⁽⁴¹⁾, as well as submissions to the public consultation on the Issues Paper^(42,43).

The Issues Paper placed relatively little emphasis on the potential of climate change and other environmental pressures to impact Australia's future food security, and had little to say on nutrition and public health concerns. The Paper also placed little emphasis on the role of government intervention to address the drivers of obesity, indicating its preference for an approach based on consumer choice: 'the government's policy is to allow commercial entities to position themselves to facilitate consumer preferences'⁽³⁹⁾ (p. 41). When the development of a National Food Plan was announced in 2010, health and nutrition were initially excluded from the first phase of the Plan's development. The first phase was to concentrate on developing 'a strategy to maximise food production opportunities' and health and nutrition was to be considered in a second phase after a major national review of food labelling had concluded⁽¹⁷⁾. After public criticism of this neglect of public health concerns⁽⁴⁴⁾, the two-stage process was abandoned.

DAFF gathered feedback on the Issues Paper through roundtables, a public webcast and written submissions. There was continuing criticism from some civil society groups about a lack of transparency during the consultation process, particularly in relation to a series of 'invitation only' roundtables that took place in August 2011⁽⁴⁰⁾. Little public information was made available about the roundtables initially, although lists of attendees and a summary of the roundtable consultations were later published. Of the 180 stakeholders who attended roundtable meetings, just over 60% were from the agriculture and food industries (and associated parts of the food supply chain), 9% were from consumer and community groups, and 7% from the health sector⁽⁴⁵⁾. Other attendees came from a variety of sectors, including regional development, research and development, and education.

Over 270 written submissions were made to the Issues Paper, with the greatest number of submissions – about 30% – being made by industry and agricultural stakeholders. Just over 20% of submissions came from individuals, about 7% from local, regional and state governments, 3% from academic institutions and about 5% from actors in the public health sector. The majority of other submissions came from civil society groups across a wide range of sectors, including groups focused on social justice, animal welfare, consumer rights and environmental issues. The number of written submissions from key

sectors contrasts with the involvement of these sectors in the roundtables, described above. The Global Foundation made a submission to the Issues Paper that outlined its vision of increased food exports: 'with a forward thinking and comprehensive food plan, Australia has the potential to become a major exporter of high value-added food products'⁽³²⁾. The submission also described the involvement of its own Food Security Working Group in the genesis of the Plan. The Australian Minister for Agriculture, Fisheries and Forestry attended three meetings of the Global Foundation's Food Security Working Group prior to the announcement of the National Food Plan, where the need for a national food security strategy was discussed. This Food Security Working Group continued to collaborate closely with the Minister during the development of the Plan⁽³²⁾.

The PHAA responded to the Issues Paper by submitting a response to the consultation⁽⁴²⁾ and by developing its own position paper, *A Future for Food 2*, which outlined the PHAA's vision of a healthy, sustainable and fair food system⁽³⁰⁾. *A Future for Food 2* was an update of an earlier position paper, *A Future for Food*⁽¹⁶⁾, which was released prior to the development of the Plan and had called for the development of 'a national integrated food policy' (p. 3); as Crotty⁽⁴⁶⁾ puts it, a way of linking 'pre-swallowing' to 'post-swallowing' sciences.

Green Paper (July 2012)

The Green Paper comprised a set of possible policy options and directions for the Plan. It outlined an overarching vision of 'A sustainable, globally competitive, resilient food supply, supporting access to nutritious and affordable food'⁽⁴⁷⁾ (p. 2) and proposed seven key objectives, one of which related specifically to health: 'Reduce barriers to a safe and nutritious food supply that responds to the evolving preferences and needs of all Australians and supports population health'⁽⁴⁷⁾ (p. 2). The overall emphasis of the Green Paper was on increasing agricultural productivity and promoting the competitiveness of the food industry, and the paper proposed an ambitious target of doubling food exports to Asia.

Stakeholders in the agriculture and food industries largely welcomed the Green Paper^(48,49). However, civil society stakeholders described the Green Paper as a 'plan for large agribusiness and retailing corporations, rather than a plan for all Australians'⁽⁵⁰⁾. The PHAA published a scorecard of public health objectives that it intended to evaluate the Green Paper against⁽⁵¹⁾.

Feedback on the Green Paper was gathered via written submissions, at a series of public meetings and at eight invitation-only 'CEO-level' roundtable meetings. There was criticism from civil society groups that the public consultation process was inadequate, as public meetings were over-subscribed and some people were excluded from the process⁽⁵²⁾. In addition to the public consultation process, meetings were held with state and territory



472 governments and a small number of roundtables were
473 held with 'key representatives from across the food system
474 supply chain'⁽⁴⁵⁾.

475 Just over 400 submissions were made to the Green
476 Paper. The PHAA submission argued that the Green Paper
477 was a "business as usual" plan focusing on the economic
478 value of all food production' and that securing a healthy
479 and sustainable food supply should come before economic
480 considerations⁽⁵³⁾ (p. 12). The Global Foundation did not
481 make a submission to the Green Paper. However, in May
482 2012, a few weeks before the Green Paper was released,
483 the Australian Prime Minister, Julia Gillard, gave a speech at
484 the Global Foundation's annual summit⁽⁵⁴⁾ at which she
485 emphasised Australia's potential to become a 'regional food
486 superpower' and a 'provider of reliable, high quality food
487 to meet Asia's needs', echoing elements of the Global
488 Foundation's submission to the Issues Paper⁽³²⁾.

489 In her speech, the Prime Minister also highlighted a
490 connection between the National Food Plan and the
491 Australia in the Asian Century White Paper⁽⁵⁵⁾, which was
492 then in the final stages of development. The Australia in
493 the Asian Century White Paper⁽⁵⁵⁾ was to be a key part of
494 the Gillard Government's policy platform, outlining a plan
495 for Australia to take advantage of economic growth in
496 Asia. The Australia in the Asian Century White Paper was

released in October 2012, and the agriculture and food 497
sectors featured strongly, with a vision that 'Australian 498
food producers and processors will be recognised globally 499
as innovative and reliable producers of more and 500
higher quality food and agricultural products, services and 501
technology to Asia'⁽⁵⁵⁾ (p. 28). 502

National Food Plan White Paper (May 2013)

The White Paper⁽¹³⁾ outlined four key themes: 'Growing 503
Exports', 'Thriving Industry', 'People' and 'Sustainable 504
Food' (see Table 2). The Paper also described the initia- 505
tives through which the themes would be implemented 506
and the funding that would be allocated to each initiative. 507
The first two themes, 'Growing Exports' and 'Thriving 508
Industry', dominated. These two themes attracted over 509
90% of the \$AU 42.8 million total funding allocated to 510
implementing the Plan, leaving the themes of 'People' and 511
'Sustainable Food' with less than 10% of the funding. 512
The allocation of funding was indicative of the Plan's major 513
thrust and direction: the idea that Australia could become a 514
'food bowl for Asia', echoing the vision of the Global 515
Foundation⁽³²⁾ and the Australia in the Asian Century 516
White Paper⁽⁵⁵⁾. About 80% of funding was allocated to 517
investigating and building ties with Asian food markets, 518
and included goals to increase food exports by 45% and to 519
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Table 2 Goals* in the green and white papers on Australia's National Food Plan

Green Paper goals	White Paper goals
Reduce barriers food businesses face in accessing international and domestic markets	'Growing Exports' theme The value of Australia's agriculture and food-related exports will have increased by 45% Australia will have stronger food trade and investment relationships with countries across the region Australia will have a globally recognised food brand that is synonymous with high-quality, innovative, safe and sustainable food services and technology
Support the global competitiveness and productivity growth of the food supply chain, including through research, science and innovation	'Thriving Industry' theme Australia's agricultural productivity will have increased by 30%, helping farmers grow more food using fewer inputs Australia's agriculture and fisheries workforce will have built its skills base Australia's infrastructure and biosecurity systems will support a growing food industry, moving food cost-effectively and efficiently to new markets and supporting new export opportunities Participation by Australian food businesses in the digital economy will have increased Australia will be among the top five most efficiently regulated countries in the world, reducing business costs
Maintain and improve the natural resource base underpinning food production in Australia	'Sustainable Food' theme Australia will produce food sustainably and will have adopted innovative practices to improve productive and environmental outcomes Australia will have reduced per capita food waste
Identify and mitigate potential risks to Australia's food security	'People' theme Australia will have built on its high level of food security by continuing to improve access to safe and nutritious food for those living in remote communities or struggling with disadvantage
Reduce barriers to a safe and nutritious food supply that responds to the evolving preferences and needs of all Australians and supports population health	Australia will be considered to be in the top three countries in the world for food safety, increasing the reputation of Australia's exports Australians will have the information they need to help them make decisions about food Australian children will have a better understanding of how food is produced
Contribute to global food security	Australia will have contributed to global food security by helping farmers in developing countries gain access to new agricultural technologies

*Some goals in this table have been paraphrased from the original for brevity.



grow agricultural productivity by 30%⁽¹³⁾. The goal of increasing food exports by 45% had been watered down from an earlier goal in the Green Paper of doubling food exports, after criticism from some stakeholders that this was unrealistic, given increasing environmental constraints on food production⁽⁵⁶⁾.

Stakeholders from the food and agriculture industries largely welcomed the White Paper^(57,58). However, civil society stakeholders were less welcoming, with the PHAA calling the Plan a ‘sop to industry’ and a ‘lost opportunity’⁽⁵⁹⁾. One aspect of the Plan that attracted criticism will be explored further here: the sidelining of public health nutrition and environmental sustainability.

534 **Public health nutrition and environmental** 535 **sustainability**

Public health nutrition featured in one of sixteen goals of the White Paper under the theme ‘People’. It was no longer a central objective as it had been in the Green Paper and had effectively been removed from the Plan altogether into the development of a new, but separate, National Nutrition Policy⁽¹³⁾. Furthermore, no new funding had been allocated to initiatives to tackle obesity; instead, the principles of ‘freedom to choose’ and ‘free and open markets’ formed central pillars of the Plan. The Plan stated: ‘Australians are free to make their own choices about food ... we will only intervene to prevent harm or meet our international obligations. We will provide information so people can make “informed choices”’⁽¹³⁾ (p. 18).

Environmental sustainability was also largely overlooked in the Plan. No significant initiatives were proposed to shift food production to more environmentally sustainable approaches and there was little consideration of what increasing exports might mean for the long-term sustainability of Australia’s food production base. The Australian Greens (a national political party with roots in environmental politics) argued that the Plan failed to address the impact of climate change on food production⁽⁶⁰⁾. About 17% of Australia’s greenhouse gas emissions are related to agriculture⁽⁶¹⁾ and climate change is likely to lead to a significant reduction in water availability in Australia’s main food bowl, the Murray–Darling Basin⁽⁶²⁾. The Plan said little about these issues and allocated no new funds to encouraging sustainable food production^(63–65).

564 **Discussion**

The National Food Plan began with the stated intention of being an integrated national food policy, but evolved into an industry-focused plan in which both health and environmental sustainability were sidelined. Despite one Senator’s⁽⁶⁶⁾ claims that government departments are driven by the green agenda, the green and health lobbies were ineffective in advancing the case for health and climate change⁽⁶⁷⁾. The final Plan also had little focus on

Australia’s domestic food supply and became primarily focused on increasing food exports to Asia. Yet Australia and its population also face food security challenges, such as food insecurity among vulnerable population groups and environmental limitations to food production, including water scarcity and soil degradation^(68,69). There were, however, some positive aspects to the Plan’s development, including the opportunities for stakeholder consultation through the process.

Issues of what Howlett⁽⁷⁰⁾ calls repeating policy cycles are evident, in the sense that the situation in 2012/13 echoes aspects of the 1992 attempt at integrated food policy development⁽⁷⁾. The central policy direction of increasing food exports to Asia was influenced to a significant extent by key players, such as the Global Foundation, ensuring that the problem, policy and politics streams came together in a similar way to previous occasions in 1987 and 1992, when business interests won the day. In Buse *et al.*’s⁽²³⁾ terms, public health nutrition and sustainable food supplies have been removed from the content of policy development, a pattern repeated elsewhere^(64,65).

Our analysis highlights how one of the key actors, the Global Foundation, used its ‘unique, bipartisan model of public–private cooperation on policy development’⁽⁷¹⁾ (p. 6) to enable key food industry stakeholders to collaborate with each other, and with government, in developing a clear vision for Australia’s food future. Such was the Global Foundation’s influence on the development of the Plan that the organisation describes itself as the ‘architect of Australia’s first national food plan’⁽⁷²⁾. It seems that the Global Foundation operated beyond the formal submission and lobbying processes and was successful in gaining the confidence of politicians and civil servants. As a result, the Food Security Working Group established by the Global Foundation played an important role in shaping the Plan.

The policy development process for the National Food Plan also provided the food and agriculture industries with significant opportunity to influence the development of the Plan, as did its location within DAFF. The National Food Policy Working Group and roundtables to discuss the Issues Paper were both industry dominated. Assigning responsibility for the development of the Plan to DAFF, rather than to a cross-government Task Force, also cemented the influence of the federal department of agriculture and lessened the potential for other government departments, such as the federal Department for Health and Ageing, to influence the process. van Zwanenberg and Millstone⁽²⁸⁾ describe a similar situation in the establishment of the UK Food Standards Agency, where despite initial calls for the Agency to deal with issues across the food chain, the issues of food safety and nutrition were separated from farm and export policy.

In contrast to the central role that the Global Foundation assumed in the Plan’s development, the PHAA and the



629 public health nutrition sector were under-represented in
 630 the policy development process. The Global Foundation
 631 built a powerful alliance of stakeholders from across the
 632 food and agriculture sectors, but the PHAA engaged to a
 633 lesser extent in alliance building. Its two 'A Future for
 634 Food' papers^(16,30) presented an integrated vision of a
 635 'sustainable, healthy and fair' food system, but it did not
 636 build strong cross-sector alliances with the broader
 637 movement of civil society groups who came together to
 638 form Australian Food Sovereignty Alliance. This broader
 639 movement included groups focused on food sovereignty,
 640 community gardening, social justice and environmental
 641 sustainability^(38,73). While the food and agriculture indus-
 642 tries presented a coordinated agenda under the banner of
 643 the Global Foundation, the response from the public
 644 health sector was fragmented in comparison. Bronner⁽⁷⁴⁾
 645 highlights the limits of public health nutrition and suggests
 646 that sometimes the best that can be hoped for is that
 647 nutrition policies are incorporated into public health
 648 policies. This seems to miss the opportunity to engage
 649 with the wider food system and to influence the deter-
 650 minants of poor nutrition at a structural level. Although
 651 cross-sector alliances can be fraught with difficulty and
 652 temporary in duration, as agendas may differ over prin-
 653 ciples and even evidence, the new ecological public
 654 health and sustainable diets agenda offers an opportunity
 655 for a broad alliance of (disparate) interests to come together
 656 in pursuit of common goals.

657 The Issues Paper, Green Paper and White Paper
 658 presented 'windows of opportunity' that were missed for
 659 public health nutrition to work together in a broad alliance
 660 with other sectors. The process and content from issues
 661 paper to white paper reflects the first shifting of the
 662 problem and the lack of an opportunity (or policy window)
 663 to address a comprehensive food policy where national
 664 interests were matched with those of export and economics.
 665 At the same time, the National Dietary Guidelines were
 666 being revised and even here the opportunity was lost to link
 667 food production and nutrition to sustainability^(63,67).

668 There emerges a lack of problem definition for policy to
 669 tackle, complicated by multiple diverging streams – for
 670 example, the divergence of agriculture and nutrition,
 671 export-oriented agriculture and local/regional food policy.
 672 There were no links or overlapping of the three streams of
 673 problem, policy and politics occurring as Kingdon⁽²²⁾
 674 contends. These data also illustrate other characteristics
 675 that depart from Kingdon's⁽²²⁾ model. The National
 676 Food Plan experience shows that the streams might be
 677 omnipresent, but they did not meander of their own
 678 accord. Instead, their route and the velocity with which
 679 they travelled were influenced by powerful actors who
 680 engineered the forging of where, when and under what
 681 circumstances the streams came together.

682 At a national level, a key outcome of the development
 683 of the National Food Plan has been a strengthening of the
 684 'food movement' in Australia^(38,73). The development of

685 the National Food Plan brought together numerous com-
 686 munity and environmental groups who found themselves
 687 under-represented in the policy development process.
 688 A number of these groups went on to form the Australian
 689 Food Sovereignty Alliance, releasing an alternative vision
 690 to the National Food Plan, The People's Food Plan⁽³⁸⁾.
 691 Alternatives are emerging to the neoliberal, economically
 692 focused food policies of national and state governments in
 693 Australia. They are emerging from local and regional
 694 governments and alliances of civil society organisations.
 695 These plans are partly a response to the failure of national
 696 food policy to address issues related to health, environ-
 697 ment and social equity and to deal adequately with those
 698 issues alongside economic objectives. These alternative
 699 policies seek to integrate economic goals into broader
 700 agendas that promote a healthy, fair, sustainable and
 701 prosperous food system. Examples in the State of Victoria
 702 include the City of Melbourne Food Policy⁽⁷⁵⁾ that was
 703 developed in 2012 and several regional food policies that
 704 are currently under development^(76,77). The challenge for
 705 these local movements will be to engage and remain
 706 policy relevant with the mainstream and not, as Guthman⁽⁷⁸⁾
 707 reflects, by elevating the production and consumption of
 708 local food to the level of political action, a different form of
 709 consumerism and in itself a form of depoliticisation. These
 710 new social movements need to both work below the surface
 711 of the dominant food system to raise awareness but also to
 712 create new alliances to challenge policy⁽⁷⁹⁾. The danger
 713 is that these new social movements themselves become
 714 divisive by engaging in what Melucci⁽⁸⁰⁾ calls 'regressive
 715 Utopianism' (p. 4).

716 A few months after the National Food Plan White Paper
 717 was released, the Labor Government lost the federal
 718 election and the Abbott Government (a Liberal-National
 719 Party Coalition) came to power with an agenda of a
 720 shrinking state and a belief in the neoliberal system to
 721 deliver benefits without government interference. The
 722 National Food Plan was quickly and quietly shelved, and
 723 the new Government began work on its own Agricultural
 724 Competitiveness White Paper⁽⁸¹⁾. The focus is firmly on
 725 identifying 'pathways and approaches for growing farm
 726 profitability and boosting agriculture's contribution to
 727 economic growth, trade, innovation and productivity' and
 728 public health nutrition issues are not within scope. The
 729 development of a separate National Nutrition Policy
 730 continues, although little information has been made
 731 public about its development.

732 Although the National Food Plan has been shelved, the
 733 push for Australia to become the food bowl of Asia looks
 734 likely to gather pace. In effect, a food export plan is under
 735 development with little focus on health and sustainability
 736 concerns. The Global Foundation has advanced its policy
 737 platform on 'Feeding Asia and the World' with both the
 738 governing and opposition parties in Australian politics,
 739 and its vision of Australia as a 'clean green foodbowl
 740 of Asia' was evident in both the Coalition Government's

741 pre-election policy platform⁽⁸²⁾ and the development of
742 the Agricultural Competitiveness White Paper⁽⁸¹⁾.

743 Conclusions

744 The present article highlights how corporations and food
745 industry interests shaped Australia's National Food Plan. It
746 underlines the message that policy making is not primarily
747 based on objective evidence, but is shaped by other
748 influences, such as politics and business. The study illus-
749 trates that it is no longer sufficient for the field of public
750 health nutrition to engage solely in formal policy con-
751 sultation processes. Public health nutrition, as a movement,
752 needs to shift beyond traditional lobbying and evidence
753 submissions to winning hearts and minds. Engaging broad
754 public support and developing strong cross-sector alliances
755 with civil society groups in the environment, social justice
756 and community food sectors has the potential to achieve
757 greater policy leverage. The evidence also suggests that
758 engagement of the public health sector with industry
759 should be approached with caution.

760 Finally, the article raises the question of whether
761 pursuing a 'whole of government' food and nutrition
762 policy is always the best option to achieve policy leverage
763 for public health nutrition. In the case of Australia's
764 National Food Plan, the policy arena was dominated by
765 powerful agri-food industry interests and responsibility for
766 the Plan's development lay with the federal agriculture
767 department, rather than an inter-departmental unit. As a
768 result, public health nutrition interests were squeezed out
769 by a dominant trade agenda. Under these circumstances,
770 the development of a national nutrition policy may offer
771 the public health nutrition sector greater opportunity for
772 policy influence than an integrated national food and
773 nutrition policy. It remains to be seen whether this is the
774 case in the ongoing development of Australia's National
775 Nutrition Policy. However, a key lesson for public health
776 nutrition is the need to carefully assess policy environ-
777 ments to determine whether they offer the potential for a
778 genuinely integrated food and nutrition policy that places
779 health, social equity and environmental sustainability at
780 the heart of the policy development process. The alter-
781 native, though, represents a continuation of existing
782 approaches to nutrition policy, rather than addressing the
783 need for a 'whole of government' food and nutrition policy
784 that integrates the food chain from paddock to plate.

785 Acknowledgements

786 *Financial support:* This research received no specific grant
787 from any funding agency in the public, commercial or
788 not-for-profit sectors. However, part of the research was
789 carried out while R.C. was an employee of the Food Alliance,
funded by VicHealth, and while M.C. was 'Thinker in

Residence' at Deakin University, March–May 2012. *Conflict
of interest:* R.C. is an employee of the Food Alliance, an
organisation based at Deakin University that advocated on
the development of the National Food Plan. M.C. was
'Thinker in Residence' at Deakin University, based at the
Food Alliance, from March to May 2012. M.L. was the grant
holder for the setting up of the Food Alliance. *Authorship:*
R.C. and M.C. collected and analysed data, and were
responsible for the first complete draft of the paper. M.L.,
S.F., M.C. and R.C. all contributed to subsequent drafts of
the paper. *Ethics of human subject participation:* Ethical
approval was not required.

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