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To the NT Remote Stores Program Team,

We write in regard to the proposed NT Remote Stores Program Standards for remote community stores, and thank you for the opportunity to respond to this consultation. We commend the present focus and past bodies of work the NT has contributed on stores, food supply and food security in remote Aboriginal and Torres Strait Islander communities within the jurisdiction.

Our team are academics in [Public Health Nutrition](#) at Monash University in the Department of Nutrition, Dietetics and Food (Faculty of Medicine, Nursing and Health Sciences), who have contributed to the evidence-base on food and nutrition security, healthy and equitable food environments as well as Indigenous peoples' food and nutrition. We lead the Benchmarking for Healthy Remote Stores in Aboriginal and Torres Strait Islander communities [MRFF2007282] and have published extensively on food security and food systems in relation to remote Indigenous communities.

Uniquely, several of our team members have had experience working as nutritionists in remote communities of the NT, and one has previous experience as Nutrition Manager with a retail management organisation, totalling over 30 years combined. We have a particular interest in the remote Australian context stemming from this experience, especially food security, food supply, health-enabling food retail initiatives and their impacts on population health. Various members of our team have appreciated the opportunities to have input into these standards throughout the development process to date.

Our response is framed throughout with reference to the definition of food security adopted by the FAO High Level Panel of Experts of the Committee on Food Security: *"Food security (is) a situation that exists when all people, at all times, have physical, social and economic access to sufficient, safe and nutritious food that meets their dietary needs and food preferences for an active and healthy life."* Key to this definition is nutritious food that meets dietary needs - that is, the quality of the food supply is paramount, and access to any type of food, even if of sufficient quantity, does not necessarily equate to food security.

We thank you for considering our response.

Sincerely,

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# NT Remote Stores Program Consultation

## MONASH UNIVERSITY RESPONSE

### Range of food, drink and grocery items

**Will the minimum range of product types that stores will be required to provide, as listed in Schedule A, meet the nutritional and household needs of the remote communities they service?**

No

Some product types specified in the minimum range require clearer definition to determine if they are suitable to meet the nutritional needs of residents of remote communities. The following products in the Schedule would benefit from a definition of nutritional quality in order to reduce openness to interpretation and ensure consistency in implementation and enforcement:

- 'Meat or seafood or vegetable meals (Shelf stable or frozen)'
- 'Savoury biscuits'
- 'Additional Healthy cereal'

Based on our experience of developing an App (Store Scout) to assess healthy store practice as well as training and supporting users to apply this tool in the field, we have found it is important to minimise user decision-making to ensure consistency, and that nutritional quality criteria need to be simple to apply. We suggest that a look-up tool such as the [Good Tucker App](#), developed by Uncle Jimmy Thumbs Up!, Menzies School of Health Research and The University of South Australia to identify the healthiness of food and drink options available in-store could be used for this purpose. This application allows the scanning of the barcode on a product, showing classifications of 'Best Choice' (green/ double thumbs up), 'Good Tucker' (green/thumbs up), 'Limit' (Yellow/thumbs sideways), and 'Avoid' (Red/thumbs down). This tool has been validated and found to be superior to the Health Star Rating and NT School Canteen Guidelines in its ability to accurately identify product healthiness (1), as assessed by products classified as green – 'Thumbs up' or 'Double thumbs up'. Monash University through Professor Julie Brimblecombe is involved with Uncle Jimmy Thumbs Up! And University of South Australia in the management and use of the Good Tucker App.

There are several considerations if the 'Good Tucker' App were to be recommended for use by stores as part of the NT Remote Stores Program. We would be happy to work with the NT Remote Stores Program to find solutions for these.

- General guidance would need to be provided for each product category in the instance that the product does not scan, which we would be happy to share from our Store Scout App.
- The 'Good Tucker' App is managed by The George Institute in collaboration with Uncle Jimmy Thumbs Up!, Menzies School of Health Research and University of South Australia. The annual licence fee to The George Institute is \$20,000.
- The product database that drives the 'Good Tucker' App needs annual updates as new products continually enter the remote stores market. We would need to put in place a cost-effective way of making these updates in partnership with remote stores

Take-away foods also require clear definitions for what is considered a healthy food. Previous National Indigenous Australians Agency (NIAA) store licensing requirements outlined expectations for a hot healthy breakfast option, healthy cold meals (salads and 2 types of sandwiches), a minimum of 2 healthy hot dishes and at least 4 healthy snacks. It is suggested that in order to ensure a variety of healthy ready-to eat options from remote residents, the standards include a requirement for stores that sell takeaway food options to offer:

- At least 2 healthy hot meal dishes and no more than 2 unhealthy hot meal dishes
- At least 4 healthy snacks and not more than 4 unhealthy snacks, and
- At least 1 salad, 2 types of sandwiches and not more than 3 unhealthy cold meal options.

The following products would benefit from the following suggested changes:

- **'Baby formula suitable from birth to 6 months and 6 to 12 months'**: expectations around stocking of these are unclear, due to two products listed in one line of the table- this could be interpreted as stocking either option rather than both.

This could be rectified by altering the minimum standard to just include 'Baby formula suitable from birth to 6 months'. It is **essential** that this 0-6 months infant formula is available to families that need it in remote communities, as it is the only suitable alternative to breastmilk for newborns (2). Step 1 baby formulas, despite being labelled for birth-6 months, are also suitable to use beyond 6 months of age up until 12 months when cow's milk can safely be introduced. In contrast, Step 2 formulas labelled from 6-12 months are **unsuitable** for feeding to infants under the age of 6 months due to the increased protein and mineral content. In practice this standard will be easier to implement and enforce, and as (anecdotally) these products are not always utilised in every community at any one point in time, this could also reduce waste and unnecessary expense for stores if they are only required to stock 1 baby formula product.

Alternatively, if including both products as essential, this issue could be rectified by including both products on separate lines of the table (see below).

- **'Yoghurt (unsweetened reduced fat)'**: change to 'Yoghurt', in line with 'Cheese' which has no additional criteria placed on it.

Based on our experience of collecting food price data in 29 remote stores in the NT, with the MRFF [2007282] Benchmarking for Healthy Stores in Remote Aboriginal and Torres Strait Islander communities study (3) led by Monash University, very few stores routinely stocked an unsweetened reduced fat yoghurt (exact numbers can be provided if required).

In co-design working groups for updating our Store Scout App, remote food retail partners have advised us that unsweetened yoghurts are often not stocked due to poor sales, and hence may be an unrealistic expectation to include in the standards. In response to this feedback we removed the 'unsweetened' criteria from the yoghurt questions in the App, with stocking both a regular fat and lower fat option as the recommended practices.

This requirement may need further advice from remote retail stakeholders to ensure its feasibility to implement in practice.

- **Fruit Juice 100%**: specify no added sugar
- **'Water - bottled in refrigerator (small and large)'**: provide definitions of range or cut-offs for small / large sizes, e.g. small water 400mL-750mL, large water 1-1.5L. Suggest listing these two products on separate lines in the table (as specified above)

Lastly, the documentation of items in the table is inconsistent which could contribute to different interpretations being applied by stores and/or assessors. Some lines contain two items but the requirements are listed differently, for example:

- 'Hair shampoo and conditioner' states '1' is required to be stocked- it is not clear if this is one shampoo, one conditioner, or one of both.
- 'Cereal: Wheat-bricks and rolled oats' states 'both' are required to be stocked.

For clarity and consistency, we suggest to break up any cells which contain two or more products so that one item is listed per line of the table to avoid any confusion in implementation and enforcement, for example, for the above items:

- 'Shampoo'
- 'Conditioner'
- 'Cereal: Wheat-bricks' and
- 'Cereal: rolled oats'

**Is the range of products required for each store classification at Table 1 (basic, small, medium, large) appropriate for those store sizes?**

Suggest input from remote retailers is of greatest importance for this question.

**Are the proposed store classification criteria in Table 1 valid, or do they need changing?**

No - need changing

We do not agree that 'Standalone takeaways are considered to be supplementary rather than significant to food security'. Ready-to-eat foods and meals make a significant contribution to food intake and food security in remote communities, they are convenient and provide food security especially when health hardware such as cooking equipment, utilities such as electricity for refrigeration and physical infrastructure such as food preparation and safe food storage facilities may not be readily available or in working order.

The below Table is extracted from a PhD thesis (Brimblecombe 2007) and shows the contribution of different food types of different food outlets in a remote community. The take-away in this community contributed around one-fifth of community energy intake and was a key contributor to nearly all food types, particularly confectionery, pies and pasties, fried chips, chicken, beef and fruit juice. Whilst these data are from the early 2000s, takeaway outlets have become more prevalent and prominent in remote communities. It is unlikely that their contribution to food security is less than what it was shown to be in this one community in earlier years.

**Table 5.2 Contribution of different food outlets to total availability of selected food items**

	Store	Percent contribution to total macronutrient (%)		
		Take-away	School canteen	Aged Care program <sup>1</sup>
<i>Energy</i>	79.3	18.3	2.1	0.3
<b>Food</b>	<b>Percent contribution of food outlet to total weight of food item (%)</b>			
Fresh fruit	41.3	19.3	20.0	19.4
Fresh vegetables	71.2	9.8	3.1	15.9
Table sugar	88.6	10.9	0.5	-
Confectionery	49.0	45.6	5.40	-
Flour	91.8	7.0	1.2	-
Bread	90.1	8.9	0.9	-
Wholegrain bread	77.7	-	22.3	-
Pies & pasties	36.3	56.5	7.2	-
Grains & starch	91.1	7.7	1.2	-
Biscuits	95.5	1.1	3.4	-
Deep fried chips	8.1	91.9	-	-
Chicken	45.1	51.9	3.0	-
Canned corned beef	80.4	19.6	-	-
Beef	46.7	49.6	1.4	2.3
Aerated drinks	75.2	20.6	4.20	-
Fruit juice	33.2	51.3	15.5	-
Water	55.4	38.4	6.30	-
Margarine	82.1	17.0	0.9	-
Milk & milk products	77.2	21.5	1.4	-

<sup>1</sup>The Aged Care program provides a weekly basket of fresh fruit, fresh vegetables and meat to community clients

The requirements for a Basic Store need to be changed to ensure that take-away and other food retail outlets (e.g. service stations/roadhouses, convenience stores, cafes, bakeries, etc.) can be included in the NT Remote Stores Program, or another criteria added specifically for the inclusion of take-away (or specialised food) outlets. The previous NIAA NT Stores Licensing Program inclusion in the program was "stores to be a significant source of food, drink OR grocery items". Changing OR to AND modifies the program for its inclusion of take-away and specialist food outlets.

Take-away and other food retail outlets in, or adjacent to, remote communities should be held to the same standards to 'provide a range of healthy food and drink' and 'promote good nutrition and healthy products to support the health and wellbeing of communities', as well as adhere to the same standards of ethical practice and good management as community stores.

If some food retail outlets are exempt from the program and not subject to the same standards, they will not be able to be monitored and regulated around health (e.g. provision of alternative healthy take-away options) or ethical practices (e.g. book up), and display of accurate price ticketing, which is a significant gap and undermines the efforts to address these issues in community stores.

Take-away and other food retail outlets in or adjacent to remote communities serve as competition to the community store and if allowed to provide and promote unhealthy options with no regulation, they have an unfair competitive advantage and may become a viability risk to the community store, which is then a risk to the food security of the community. Not regulating all remote food outlets in the same way jeopardises the purpose of applying standards to achieve a level playing field and promote health and good retail practice within and across all remote communities.

The National Strategy for Food Security in Remote First Nations Communities draft discussion paper advocates for ensuring “takeaway outlets are included in food security strategies to ensure better nutrition outcomes for communities” (4). We note the NT Remote Stores Program discussion paper states that once the National Strategy is finalised later in 2024, the NT government will see if any changes need to be made to the program to align it with the Strategy. Including take-away and other food retail outlets as part of the NT Remote Stores program at this stage prior to its implementation is an opportunity to align with the direction of the National Strategy from the outset.

Potential solutions to ensure that takeaway and other food retail outlets are included in the NT Remote Stores Program include:

1. Modifying the text of what constitutes a community store to be ‘a significant source of food, drink OR groceries’ as per the previous NIAA Stores Licensing Program, or
2. Having an additional classification of store for those outlets where primarily ‘ready to eat’ meals and drinks are stocked.
3. Indicating a clear timeline for when takeaway outlets will be included in the NT Remote Stores Program

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

#### *1. Improvement in transport infrastructure*

Evidence indicates that 6 of the 8 critical road key freight routes rated as high or very high vulnerability are located in the Northern Territory (Arnhem Highway, Buchanan Highway, Carpentaria Highway, Central Arnhem Road, Lasseter Highway and Stuart Highway). Disruption of these critical routes can result in communities being completely cut off from essential freight, including food, for periods of up to 6 months per year (5). Workarounds, (e.g. air freight), are extremely costly, and hence these disruptions can impact on both the availability and affordability of food and pose a significant risk to the food security of remote residents.

NT government investment into improvements in road infrastructure would help address this issue, as well as the NT government applying for relevant federal grants to assist with this. We note that in the recent Australian Government funding round under the Remote Roads Upgrade Pilot Program, none of the 33 successful applications were from the NT (6), despite the fragile freight network and large population of residents in remote and very remote areas that exists in the Territory. Additionally, improvements in shipping lanes and landing infrastructure would assist those stores reliant on food transport by sea.

#### *2. Remote stores infrastructure grants*

NT Government could consider providing regular grant opportunities for stores to apply for to improve storage infrastructure to assist with managing seasonal supply disruptions and minimise increased food delivery costs during these times, as well as make improvements to their energy efficiency (e.g. solar power systems, equipment upgrades, etc) which can assist with lowering their ongoing operational costs. Health program grants could additionally be opened to include these improvements.

#### *3. Regulation of freight operators*

Freight is one of the largest costs to remote stores. From our Benchmarking for Healthy Stores study [MRFF2007282], the majority (69%) of our 29 participating remote stores in the NT agreed freight costs were a barrier to implementing healthy in-store operations (7). In a market with little competition, there may also be a role for the NT government in regulating local freight operators – many stores have little choice in operators, particularly for those reliant on sea transport (8), and it may be important to consider a level of government regulation to ensure that freight monopolies are not exploiting their dominance resulting in unnecessary cost increases to remote stores.

#### *4. Subsidisation of core healthy food costs*

The significant overhead costs associated with food retail in remote communities (including freight, maintenance, repairs, recruitment/staffing) are inevitably passed on to the consumer to keep businesses viable. The NT government together

with the Commonwealth Government could potentially play a role in offsetting these costs through a subsidy program with the aim to reduce the cost of core healthy foods to remote residents. Queensland Government for example, have this year commenced a five-year Remote Communities Freight Assistance Scheme of \$10 million per annum (indexed) to help relieve the cost of living for remote communities (9). A discount on “eligible essential goods” (including healthy foods and drinks and domestic household items such as cleaning products, toothpaste or toilet paper) is applied by the retailer at the checkout to ensure the discount reaches customers. This method of application may give an alternative to previous commentary that there is risk that freight subsidies that would not make it to the customer if provided through freight operators (8).

Evidence indicates that the magnitude of a price discount needs to be of significance to customers to influence purchasing behaviour - studies have found 20% price discounts on fruit, vegetables, water and diet soft drink increased purchases of fruit, vegetables and water (10, 11). It is also important that the price discount (or added value) is signalled clearly to the customer (e.g. through shelf ticketing) (11). Alongside price discounting of healthy foods, restrictions on unhealthy food promotions and/or price increases on unhealthy foods can help to promote budget saved with discounting being spent on nutritious options (10, 12, 13).

Application of a subsidy program would require mandated price monitoring to ensure the discount is being passed onto the customer at point of sale - this can be done electronically through point-of-sale data which our team has expertise with. Through the Benchmarking for Healthy Stores study [MRFF2007282] we have established a data pipeline that links large store sales datasets to food and nutrient data for the purposes of monitoring and evaluation. We would be happy to share this expertise.

#### *5. Improved food price monitoring and continuous improvement*

We commend the regular monitoring of food price that occurs in the NT through the biennial Market Basket Survey (MBS), and agree that all stores should be mandated to participate in this survey through the NT Remote Stores Program. The successful execution of this in practice however requires an adequately resourced workforce to collect the data, as historically, there is not always 100% coverage of stores even amongst those who may consent to participate due to limitations in Public Health Nutritionist workforce cover and capacity in the NT.

There is opportunity to improve the reporting of MBS food price data for use by food retailers and retail management organisations both internally and for advocacy purposes. Through our Benchmarking for Healthy Stores study [MRFF2007282], we collected food price data using the Healthy Diets Australian Standardised Affordability and Pricing (HD ASAP) protocol (3), as well as the MBS protocol. HD ASAP is a nationally standardised tool which has the advantage of allowing comparison of food price across jurisdictions. We will be working to compare the two protocols and can share findings once available.

Our Benchmarking Food Pricing Co-design Task Group (comprised of retail and nutrition professionals, policy makers and academics) advised that capturing the ‘cheapest available’ diet (or food basket) rather than just standardised branded products was considered highly important. Additionally, presenting the store’s food costs compared to other like stores with regards to freight modality and presence of competitors in/adjacent to community were also considered of importance (not currently part of the MBS); as was comparison to the regional average (already part of the MBS). Addition of these variables to the interpretation of MBS results could provide additional insight into the influence of unavoidable environmental factors on food price, as well as show the work stores are doing to provide cheaper healthy product lines to customers to combat increased costs of living.

Use of food price data at the individual store level could also be improved through providing timely and direct feedback on performance as well as support for continuous improvement around food price where indicated. For example, recommendations of potential pricing strategies to reduce healthy food costs within the means of the store, in line with best-evidence could be considered. The [Healthy Stores 2020 Policy Actions Series](#) provides this best-evidence for food pricing interventions and was co-designed with the remote store sector, policymakers, practitioners and academics.



We can provide insights on how feedback has been provided through our current Benchmarking for Healthy Stores project [MRFF2007282], where we utilise a continuous improvement cycle to provide store decision-makers with feedback on their performance as well as recommendations for opportunities to improve to facilitate decision-making at the store level to implement action for improved health-enabling store environments (3). Evidence shows reports provided to stores need to be discussed to facilitate action (14) and that store managers have limited capacity to undertake continuous improvement processes without support to make change (15).

This monitoring of food price via the MBS provides a mechanism for the NT Government to review its performance and ensure that food affordability in remote communities is a focus across government departments, policies and strategies, in line with global recommendations for health in all policies.

**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?**

Not in their current form.

We support the uptake of two key policy asks of the Coalition for Healthy Remote Stores (16) as standards to reduce sugar sales:

- 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 to be used for sugar sweetened beverages.

For this second standard on sugar-sweetened beverage (SSB) refrigerator facings to be consistently applied and assessed, it will be necessary to provide clear definitions of SSB to include in the count of facings. In our Store Scout App, this currently includes “soft drinks, flavoured mineral waters, sports drinks, energy drinks, iced teas, fruit juice, fruit drinks and cordials”. It would need to be determined whether other beverages such as flavoured milk are included - these are not currently included as SSB in our Store Scout App. Our team has experience in the monitoring of SSB facings and would be happy to provide this expertise.

We commend the inclusion of a standard on promotional activity: “The majority of store promotional activity carried out must be on healthy food and products”. However, currently the stated wording would allow up to 49% of promotional activity in store to be on unhealthy products. In addition, it would be difficult to implement for the store, and to objectively assess compliance - every promotional activity in each store would need to be identified and then classified as healthy vs

unhealthy products before being summed to determine whether the majority percentage of promotions are on healthy products, which would be onerous and time consuming.

Evidence from the randomised controlled trial Healthy Stores 2020 showed that limiting promotional activity in stores to healthy foods only, resulted in a 2.8% reduction in sales of free sugar (a clinically significant reduction; and a reduction equivalent to 1.8 tonnes less sugar sold during the trial) (17).

**We recommend strengthening the standard on promotional activity to:**

- **Store promotional activity must only be carried out on healthy products.**

This standard would not only be simpler to apply and assess, but in line with best practice evidence for sugar reduction generated specifically in the remote food retail context.

Clear definitions of what constitutes promotional activity, and what products are categorised as healthy would need to be provided for this standard. For this purpose, promotional activity would include price promotions as well as other promotional activity including prominent placement in store. We can share definitions from our Store Scout App, where:

- Price promotions include discounts, deals, sales or specials and promotions of usual price that are visibly advertised to customers on signs, fridge stickers or shelf tickets.
- Other promotional activities (not relating to price) include displays, posters, signage, shelf stripping, ticketing, fridge/cabinet branding, recipe cards, giveaways and demonstrations that encourage customers to purchase/consume a particular product or product type.
- Prominent locations or high traffic areas in-store include: areas visible from store entrance, front of store, checkout area and counter, near ATM, and front-, between- and end-of-aisle displays.

We have developed the Store Scout App which supports promotional activity on healthy food only in remote stores and would be happy to provide access, training and coaching in the use of the Store Scout App; if to be used alongside the NT Remote Stores Program. The Store Scout App measures have been co-designed with the remote store retail and health service sectors.

We suggest healthy products could be identified using the [Good Tucker App](#), a validated, simple look-up tool to determine the healthiness of food and drink options (1), as described earlier under *minimum range requirements*. Healthy products would be defined as those classified as green – ‘Thumbs up’ or ‘Double thumbs up’. Again, general guidance would need to be provided for each product category in the instance that the product does not scan, which we would also be happy to share from our Store Scout App. For assessment purposes, if any products classified as amber or red are found to be promoted in any way, the store would be non-compliant.

We also support the requirement that: “Each store must develop and apply a written nutrition policy”. In practice, it is likely independently managed and privately operated stores will require support from an adequately trained and skilled workforce to achieve this.

While we note that it is also stated that “The store operator will support and collaborate with NT Government nutritionists and health staff and local Aboriginal Medical Services Staff to implement health promotion strategies; nutrition education activities or signage”, the public health nutrition workforce is overstretched in its often dual role of clinical dietetics and preventative health.

The public health nutrition workforce is a critical resource for supporting food security initiatives in remote communities (18). Further investment into workforce capacity is required to work with remote community stores. Public health nutritionists have a unique skill set to effectively support stores to promote good nutrition and healthy products. However, there can be limited strategic support for store work in a public health nutritionist’s workload, with the medical model of health often dominating their work in the community.

Recent research into the capacity of the remote public health nutrition workforce called for adequate store-specific training, resources, and organisational support for the workforce to lead the co-design of healthy remote food retail (18). We have also shown in a partnership study with NT Health - Central Australia Public and Primary Health Care and Outback Stores (manuscript under review), that use of the Store Scout App can enhance the capacity of public health nutritionists to engage effectively with remote stores for healthier stores.

Additionally, not all stores have access to a nutritionist to support them to undertake and sustain healthy food retail practices and promotional/educational activities, and there is considerable staff turnover in the remote context. With this in mind, it will be important for training, templates and resources to be available to health and nutrition workers as well as retailers to support them to meet these requirements around nutrition policy and promotional/educational activities.

Through our Benchmarking for Healthy Stores study [MRFF2007282], we have developed a remote Store Nutrition Policy template based on best practices from the Healthy Stores 2020 Policy Action Series and the Store Scout App which we would be happy to share. Our team also has extensive experience in providing training in healthy food retail for practitioners through our aforementioned Benchmarking for Healthy Stores study, Monash University’s [Transforming](#)

[Retail Food Environments to be Health-Enabling](#) short course, and previous collaboration with Queensland Government's [Project ECHO](#) to deliver the Healthier Remote Food Stores series (19), and can share insights and materials if needed.

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

The effective promotion of good nutrition and healthy products in community needs to be supported by effective implementation of the NT Remote Stores Program standards across *all* remote food retail outlets, including grocery stores, take-away outlets as well as service stations/roadhouses, convenience stores, cafes, bakeries and other specialised food outlets. This needs to include effective and adequately resourced implementation; the monitoring, review and evaluation of stores; and the raising of benchmarks if stores are compliant.

We commend the NT Government on the NT Remote Stores Program initiative and its use of research evidence. Its success hinges on its governance and centring of Indigenous leadership; effective implementation, monitoring and evaluation; and enforcement of standards in a way that enables stores to learn, with ongoing review and continual improvement.

Communication to both remote stores and the communities these stores serve on how the program is progressing and its impact will be critical to its success. In the Benchmarking for Healthy Stores study [MRFF2007282], Store Directors spoke of the importance of sharing information about store initiatives with the rest of the community. In response to this, with the input of community advisers and representatives from remote food retail and health services, we have co-designed posters to provide a visual summary of the healthiness of the store across a range of measures. We would be happy to share these as an example of communication of store initiatives with the community. Community also need an understanding of what the NT Remote Store Program hopes to achieve, what they can expect to see change in their store, and who they can contact if they are not satisfied.

Initiatives to effectively promote good nutrition and healthy products in community need to be community-led, incorporating Indigenous Knowledges and Values into each initiative. Traditional foodways are central to Aboriginal and Torres Strait Islander peoples ways of being, doing and knowing, providing social and cultural strength. New foodways also provide opportunities for social connection within communities. It has been suggested that the sharing of nutrition information regarding new foodways with a connection to traditional foodways will help to promote good nutrition in communities (20, 21).

**Will an assessment against the proposed draft Standards be effective in monitoring store viability?**

While in the discussion paper under Ensuring Continued Viability, it is noted that “it is proposed there is a Standard requiring stores to act ethically, provide information to customers in clear and plain English, and to assist customers to understand their rights as consumers”, under Section 4 of the draft standards this does not seem to come across clearly. We strongly agree that all consumers have the right to be informed of their rights in a meaningful and comprehensible way, and recommend that this requirement for stores to provide information to customers in clear and plain English, and to assist customers to understand their consumer rights be clearly stated as a standard. There is also an obligation on the NT Government to ensure consumers in remote communities are aware of these standards and what they can expect from their stores, along with their associated consumer rights to empower communities to hold their stores to account. We suggest that a strong engagement strategy is required with the launch of these standards to enable this communication to occur across remote communities of the NT.

Other stakeholders may be more qualified to provide further comment on the financial and operational standards.

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

The notion that remote community stores must be economically viable to be sustainable is flawed as it overlooks the multiple benefits that a community store as a service provides to the community. Community stores have repeatedly called for recognition as essential services (8, 22). This would widen the scope of grants that stores could access, helping to ensure their economic and health sustainability. Importantly, it also transforms how stores are conceptualised - the critical role of remote stores in contributing to the viability of remote communities and food security has for decades been overlooked.

In 2023, food security in remote communities was written into the Close the Gap Implementation Plan (23) as foundational to the Close the Gap outcomes. This is significant as it gives opportunity for states and territories to advocate for Commonwealth funding support for stores. [Outback Stores](#) provides a model of how stores that are not of a size to be economically viable, but deemed essential for food security, can be supported with Commonwealth funding to operate. This not only provides a secure food supply, but has other benefits to the community, including employment and training opportunities. This can help to stabilise the community and prevents residents having to make long journeys to nearby communities or town stores, adding significant fuel costs to already tight family food budgets.

A recent policy analysis completed by members of our team (manuscript under review) shows ongoing issues with the governance of community stores and dominance of the store manager. Additionally, it found many previous governance

programs put in place through various entities (e.g. 2016 ORIC, NIAA, NT Government) had ceased due to decreased demand, and currently only 'basic, entry-level training' on governance is provided. Increased funding to support governance training with respect to complexity and language barriers is required, otherwise can lead to unequal governance positions in stores.

Adequate funding and human resourcing is also required for financial management and governance support services for both Aboriginal-owned and privately operated remote store businesses to ensure access to support for those stores requiring assistance. Many of these services are already under-resourced and unlikely to cope with increased demand without extra funding.

In a meta-evaluation our team completed of evaluation reports related to the Stores Licensing scheme under the NT Emergency Response (NTER) and Stronger Futures NT (SFNT) Acts (manuscript under review), we identified a number of key themes that may be useful for the design and implementation of the NT Remote Stores Program. These are:

- Despite Stores Licensing, ongoing issues associated with the governance of community stores was reported, with a lack of opportunity for input from communities into the decision-making regarding stores and lack of governance capacity building of Aboriginal store directors.
- Stakeholders reported less benefit from Stores Licensing to perceived high performing stores. However, data suggest that Stores Licensing improved the standard of management and retail operation of previously lower performing stores.

This meta-evaluation indicates that in order to support remote Aboriginal and Torres Strait Islander communities in achieving food security, future policy should consider:

- a healthy food subsidy
- measures to incentivise all and lift the benchmark for higher performing stores
- improved governance arrangements enabling self-determination for Aboriginal and Torres Strait Islander Store Directors.

It recommended future iterations of Stores Licensing should consider a tailored and culturally safe approach to governance training that recognises the store committee as the decision-making authority for their store, and acknowledges their in-depth insights into their communities. With around 40% of remote stores across Australia owned by Aboriginal Corporations (24), this leadership is critical to the success of the NT Remote Stores Program. It will therefore be important that the NT Remote Stores Program communicates effectively with Store Directors and community leaders on the program and recognises them as being the key decision-makers for community-owned stores.

**Do you have any other comments?**

No, thank you for the opportunity to respond and for considering our comments.

## References

1. Chan J, McMahon E, Wycherley T, Howes K, Bidstrup G, Brimblecombe J. Validation of the Thumbs food classification system as a tool to accurately identify the healthiness of foods. *Br J Nutr*. 2023;129(11):2001-2010. doi:10.1017/S0007114522002756
2. National Health and Medical Research Council. Infant Feeding Guidelines: Summary. 2012. Canberra: National Health and Medical Research Council. Available from: <https://www.nhmrc.gov.au/about-us/publications/infant-feeding-guidelines-information-health-workers>
3. Brimblecombe, J., Ferguson, M., McMahon, E. *et al*. Benchmarking for healthy food stores: protocol for a randomised controlled trial with remote Aboriginal and Torres Strait Islander communities in Australia to enhance adoption of health-enabling store policy and practice. *BMC Public Health* 24, 1790 (2024). <https://doi.org/10.1186/s12889-024-19277-0>
4. National Indigenous Australians Agency (& Strategy Partners). National Strategy for Food Security in Remote First Nations Communities - Discussion Paper. 2024. Available from: <https://www.niaa.gov.au/resource-centre/national-strategy-food-security-remote-first-nations-communities-discussion-paper>
5. Bureau of Infrastructure and Transport Research Economics (BITRE), Road and Rail Supply Chain Resilience Review, 2023, BITRE, Canberra ACT. Available from: [https://www.bitre.gov.au/sites/default/files/documents/Road%20and%20Rail%20Supply%20Chain%20Resilience%20Review\\_Final.pdf](https://www.bitre.gov.au/sites/default/files/documents/Road%20and%20Rail%20Supply%20Chain%20Resilience%20Review_Final.pdf)
6. Australian Government Department of Infrastructure, Transport, Regional Development, Communications and the Arts. Remote Roads Upgrade Pilot Program - successful applications (web). Available from: <https://investment.infrastructure.gov.au/about/national-initiatives/remote-roads-upgrade-pilot-program>
7. Brimblecombe J, Public Health Nutrition, Monash University – additional information, Document 37. Parliament of Australia Inquiry into Diabetes, 2023. Available from [https://www.aph.gov.au/Parliamentary\\_Business/Committees/House/Health\\_Aged\\_Care\\_and\\_Sport/Inquiry\\_into\\_Diabetes/Additional\\_Documents](https://www.aph.gov.au/Parliamentary_Business/Committees/House/Health_Aged_Care_and_Sport/Inquiry_into_Diabetes/Additional_Documents)
8. House of Representatives Standing Committee on Indigenous Affairs. Report on food pricing and food security in remote Indigenous communities. November 2020, Canberra. Available from: [https://www.aph.gov.au/Parliamentary\\_Business/Committees/House/Former\\_Committees/Indigenous\\_Affairs/Foodpricing/Report](https://www.aph.gov.au/Parliamentary_Business/Committees/House/Former_Committees/Indigenous_Affairs/Foodpricing/Report)
9. Queensland Rural and Industry Development Authority. Remote Communities Freight Assistance Scheme Guidelines, version 1. 2024. Available from: [https://www.qrida.qld.gov.au/sites/default/files/2024-01/Remote\\_Communities\\_Freight\\_Assistance\\_Scheme\\_Guidelines\\_PDF\\_286KB.pdf](https://www.qrida.qld.gov.au/sites/default/files/2024-01/Remote_Communities_Freight_Assistance_Scheme_Guidelines_PDF_286KB.pdf)
10. Brimblecombe J, Ferguson M, Chatfield M, et al. Effect of a price discount and consumer education strategy on food and beverage purchases in remote Indigenous Australia: a stepped-wedge randomised controlled trial. *Lancet Public Health*. 2017; 2:e82-95. DOI: [10.1016/S2468-2667\(16\)30043-3](https://doi.org/10.1016/S2468-2667(16)30043-3)
11. Ball K, McNaughton SA, Le HN, et al. Influence of price discounts and skill-building strategies on purchase and consumption of healthy food and beverages: outcomes of the Supermarket Healthy Eating for Life randomized controlled trial. *Am J Clin Nutr*. 2015;101(5):1055-1064. doi:10.3945/ajcn.114.096735
12. World Health Organisation. Fiscal policies for diet and prevention of non-communicable diseases. Geneva: 2016. Available from: <https://www.who.int/publications/i/item/9789241511247>
13. Magnus A, Cobiac L, Brimblecombe J, Chatfield M, Gunther A, et al. (2018) The cost-effectiveness of a 20% price discount on fruit, vegetables, diet drinks and water, trialled in remote Australia to improve Indigenous health. *PLOS ONE* 13(9): e0204005. <https://doi.org/10.1371/journal.pone.0204005>
14. McMahon E, Ferguson M, Wycherley T, Gunther A, Brimblecombe J. Development of a Tool for Reporting Key Dietary Indicators from Sales Data in Remote Australian Aboriginal and Torres Strait Islander Community Stores. *Nutrients*. 2024; 16(7):1058. <https://doi.org/10.3390/nu16071058>
15. Brimblecombe, J. Keeping track of healthy foods: Towards improving the nutritional quality of foods sold in community stores in remote Australia. 2008. Available from: <https://apo.org.au/node/3977>
16. Coalition for Healthy Remote Stores. Joint policy statement of the Coalition for Healthy Remote Stores on the NT Government's Community Stores Licensing program. 2023. Available from: [https://healthbulletin.org.au/key-resources/policies-and-strategies/46777/?title=Joint+policy+statement+of+the+Coalition+for+Healthy+Remote+Stores+on+the+NT+Government%E2%80%99s+Community+Stores+Licensing+program&contentypeid=1&contentid=46777\\_1](https://healthbulletin.org.au/key-resources/policies-and-strategies/46777/?title=Joint+policy+statement+of+the+Coalition+for+Healthy+Remote+Stores+on+the+NT+Government%E2%80%99s+Community+Stores+Licensing+program&contentypeid=1&contentid=46777_1)
17. Brimblecombe J, McMahon E, Ferguson M, et al. Effect of restricted retail merchandising of discretionary food and beverages on population diet: a pragmatic randomised controlled trial. *The Lancet Planetary Health*, Volume 4, Issue 10, e463 - e473. DOI: [https://doi.org/10.1016/S2542-5196\(20\)30202-3](https://doi.org/10.1016/S2542-5196(20)30202-3)
18. Day G, Collins J, Twhohig C, De Silva K, Brimblecombe J. Towards healthy food retail: An assessment of public health nutrition workforce capacity to work with stores. *Australian and New Zealand Journal of Public Health*, Volume 47, Issue 3, 2023, <https://doi.org/10.1016/j.anzjph.2023.100056>.
19. Christian M, Ferguson M, De Silva K, et al. Co-designing healthy remote store food environments: Using an innovative online approach to improve the capacity of the nutrition workforce in remote communities across Australia (Oral Presentation). Public Health Association of Australia's Food Futures Conference, 2022.
20. Anderson K, Elder-Robinson E, Ferguson M, et al. Pathways between foodways and wellbeing for first nations Australians. *BMC public health*. 2024;24(1):502-502. doi:10.1186/s12889-024-18005-y
21. Brimblecombe J, Maypilama E, Colles S, et al. Factors influencing food choice in an Australian Aboriginal community. *Qual Health Res*. 2014;24(3):387-400. doi:10.1177/1049732314521901

22. House of Representatives Standing Committee on Agriculture. Australian Food Story: Feeding the Nation and Beyond, Inquiry into food security in Australia. 2023. Available from: [https://www.aph.gov.au/Parliamentary\\_Business/Committees/House/Agriculture/FoodsecurityinAustralia/Report](https://www.aph.gov.au/Parliamentary_Business/Committees/House/Agriculture/FoodsecurityinAustralia/Report)
23. National Indigenous Australians Agency. 2023 Commonwealth Closing the Gap Implementation Plan. 2023. Available from: <https://www.niaa.gov.au/2023-commonwealth-closing-gap-implementation-plan>
24. Greenacre L, van Burgel E, Hill A, et al. (2023). Food retail in remote Australia [Dataset]. Dryad. <https://doi.org/10.5061/dryad.vmcvdnczc>