

The role of Australian local governments in creating a healthy food environment: an analysis of policy documents from six Sydney local governments

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Poor nutrition is a significant public health issue in Australia, with approximately 25% of children and 60% of adults living with obesity or overweight,¹ and high body mass being the second-leading risk factor contributing to the disease burden.² Improving diet-related health requires a comprehensive approach that engages all levels of government.³ However, there is significantly less research on the role of local governments (LGs) in improving nutrition compared to Australian state and federal governments. This paper aims to address that gap by analysing the food and nutrition policies of six LGs in New South Wales.

Local government comprises one of three layers of government in Australia's complex federal system.⁴ Australia has more than 500 LGs in addition to six state and two territory governments and the national Federal Government. While there are significant differences in local governance across and within the Australian states, all LGs share key core functions.⁵ These include governance, planning, community development, service delivery, asset management and regulation.⁵ The principal legislation governing the establishment and operation of LGs is local government legislation in each state. However, a range of other state laws grant them powers and functions, including environmental and planning laws, food laws and public health laws.

Abstract

Objective: This paper examines policies from six local governments (LGs) relevant to promoting a healthy food supply and consumer food environment.

Methods: We analysed the six LGs' food and nutrition policies against a framework based on Australian literature and international policy frameworks. Policy content was collected by searching LG websites and analysed with reference to recommended policy actions in the framework.

Results: All LGs took action on reducing food waste, providing food/meal services for disadvantaged groups, and providing information/education on food and nutrition. A sub-set also supported urban/local food production and markets selling fresh, healthy food. Our search did not identify any indication of a comprehensive policy framework to guide action on food and nutrition, nor did we find policies restricting opening of unhealthy food outlets, encouraging the opening of healthy food outlets, or reducing unhealthy food marketing.

Conclusions: Local governments in Australia are implementing policies to support improved nutrition. However, there are further opportunities for action, including discouraging unhealthy food outlets and restricting unhealthy food marketing.

Implications for public health: The legal remit of LGs includes responsibilities relevant to food and nutrition. Further research is needed regarding how their powers could be better leveraged to improve diet-related health.

Key words: local government, nutrition, food environment, policy, law

Traditionally, local government played a limited role in Australia's public administration. Local government is not recognised in the Australian Constitution, and remains a "creature of the states", with state legislation establishing LGs and confining it to a relatively narrow range of functions.⁴ Further, local government has limited capacity to raise revenue, with the majority of income coming from rates on the unimproved value of property.⁴ This political

and legislative context constrains local government action on food and nutrition. An absence of supportive policy and legislative frameworks at state and federal levels restricts LGs' capacity to respond to complex food system challenges.⁶ Public health legislation in Victoria, South Australia and Western Australia requires local governments to create public health plans (which some LGs have used to promote diet-related health), but the NSW *Public Health Act 2010* contains

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no similar requirement. Also, state planning acts – which set out objectives and policies implemented by LGs – generally do not allow for preventative health to be considered in planning decision making.⁷ Further, some LGs do not view food as a political priority, while others lack the financial and technical capacity for policy development.^{8–10} Accordingly, existing studies suggest that local government engagement in food and nutrition policy-making is highly uneven.^{5,8–10} However, Australian local governments could make a significant contribution to improving diet-related health, despite constraints on their powers. In recent years, state and federal governments have delegated their activities downwards, expanding LG's operations.¹¹ LGs possess a range of functions and powers that could be used to leverage access to healthy food, for example, land use planning, or providing communities with funding and education.^{8,9,12} Variation in the powers of local governments between states enables them to act as laboratories for testing innovative approaches that can be adopted at state and national levels.¹³ Local governments' closeness to their communities gives them a unique ability to identify local areas of need and to respond with targeted measures.¹⁴ Legislation also requires local governments to consult with communities in policy and planning activities, offering opportunities for deliberative forms of governance unavailable at state or federal level.⁵

A growing number of Australian LGs are drawing on these powers and functions to introduce policies that aim to contribute to healthy and sustainable food systems, as with the *Mooreland Food System Strategy* in Mooreland, Victoria.¹⁵ This follows growing policy innovation by local or municipal governments in countries such as the UK and US, often taking action in the absence of federal or state government policy frameworks.¹³ Researchers describe a new era of local government engagement in food governance, with municipal or city governments leading the way with innovative policy measures.^{16–17} Food system issues such as malnutrition and sustainability are felt most acutely in urban centres, due to rapid urbanisation,¹⁸ and cities such as San Francisco, London and Toronto have responded with food policies that take an integrated approach to economic, health, sustainability and social justice objectives^{16–18} and emphasise the interrelatedness of the entire food supply chain.¹⁷

A growing body of research describes the barriers to and enablers of these new forms of urban food governance, the mechanisms for their implementation and the key concerns of such policies.¹⁹ The latter include an emphasis on local, alternative or civil forms of urban food production^{17,20–21} as a way of creating more sustainable urban food systems and reconnecting residents to food production (although some challenge the idea that the consumption of locally produced food is necessarily a complete solution to the sustainability and health concerns posed by industrial food production).^{20–21} Urban food policies are often developed and/or implemented by food policy councils, a multi-stakeholder form of governance that includes civil society and community representation.¹⁷ The involvement of non-government stakeholders in urban food governance is seen as crucial to recognising local needs and response gaps, building capacity for policy design and implementation, and ensuring public support.¹⁷

Global initiatives also foster cooperation and information sharing between municipal governments, as with the *Milan Urban Food Policy Pact*,²² a voluntary international protocol that aims to promote sustainable and inclusive food systems. While there is growing global momentum for local government action on nutrition and food – and a significant body of research that analyses local government policy-making overseas,^{13,19} – there is much less research on the extent of policy development by Australian LGs. However, there is a recognition that urban food policy at the local level in Australia could be more effective, including through policies that: integrate health, social justice, and environmental concerns so that food systems promote healthy, sustainable and equitable diets; address the different domains, sectors and subsystems of the food system in an integrated manner; and introduce measures targeting each part of the food supply chain.²¹

This study aims to analyse NSW local government policies that impact on nutrition and healthy eating. Using six LGs in the Sydney municipal region as a case study, it considers policies that are relevant to promoting a healthy food supply and consumer food environment. Urban food and nutrition policy is defined as “concerted action on the part of a city government to address food-related challenges” including actions to protect and improve nutrition.¹⁹

Drawing upon the results of this analysis, this paper presents an overview of the key ways in which local governments in Sydney are addressing food and nutrition challenges, as well as opportunities for further action.

Methods

We created a framework for data collection and analysis from Australian academic and grey literature containing recommendations for local government action on food and nutrition (see Supplementary Appendix 1). We synthesized recommendations from these documents with recommendations for improving nutrition contained in a selection of international food and nutrition policy frameworks that were relevant to the Australian context (see Supplementary Appendix 2). These recommendations were categorized into the domains of: governance; economic drivers of the food system; breastfeeding; food supply chain; and food environments, based on a modified version of the food system conceptual model developed by the FAO High-Level Panel of Experts on Food and Nutrition.²³ We removed recommended actions outside the scope of LG's jurisdiction, e.g. using trade and investment policies to improve the availability of healthy food.

We purposively sampled six local governments in the Sydney municipal region to reflect differing levels of socioeconomic advantage and different geographical regions of Sydney: Blacktown (urban, south-west, more disadvantaged), City of Sydney (central, urban, more disadvantaged), Fairfield (western, urban, less disadvantaged), Ku-Ring-Gai (northern, urban, less disadvantaged), Penrith (western, peri-urban, more disadvantaged), and Randwick (eastern, urban, less disadvantaged). We collected relevant policy data in a three-phase search between July 2017 and December 2017. First, we collected key strategy documents required under the Integrated Planning and Reporting Framework (community strategic plan, delivery plan and operational plan) from each LG website. A second search involved typing the following search terms into the homepage search bar: obesity, nutrition, food, food tax, nutrition labelling, food marketing, processed food, diet, food supply chain, healthy food, calorie labelling, breastfeeding, food portion size, farmers markets, catering, agricultural products. Finally, we contacted each LG to ensure we had identified all

relevant policy documents. We included suggested documents not already identified through our search, except where the document had been created after the search period ended.

Policy content data was entered into a data extraction matrix (in Microsoft Excel), based on the framework described above. The matrix included: title of policy; date the policy became effective; scope (i.e. to whom the policy applied); stated objectives; any mention of the recommendations contained in the framework for analysis; any reference to other policy documents or legislation; lead government agency; and other government and non-government stakeholders identified. We also included a column for mentions of food not explicitly related to healthy eating or nutrition.

We analysed the policy content data with reference to: 1) the legal framework for LG responsibilities; 2) policy action in line with the framework; and 3) opportunities to extend policy action to improve nutrition.

Results

Local government policy documents

We identified 91 relevant policy documents across the six LGs (see Supplementary Appendix 3). The main source of policy documents (41) were those forming part of the Integrated Planning and Reporting Framework, adopted by NSW LGs under the *Local Government Act 1993* (NSW). The central component of this framework is the Community Strategic Plan, which identifies key priorities and objectives for forthcoming years. Supporting documents include the Delivery Program, Operational Plan, Resourcing Strategy and an Annual Report.²⁴ We included other reports that LGs must produce as part of the Framework, including four-yearly end-of-term reports and environmental reports. The search identified some documents that could not be classed as policies, but which were included in our analysis if relevant to the study's aims.

Local governments adopt other strategic plans to support specific areas identified in the Community Strategic Plan.²⁵ Our study included several such policies, e.g. the *Fairfield City Health Framework*, which set out strategies for meeting the health-related goals contained in the community strategic plan.²⁶ We also included policies adopted by LGs to implement functions under other

legislation, as with enforcement policies on food safety regulation. However, we excluded local environment plans and development control plans created by LGs under state planning and environmental legislation, as the large number of such documents would have significantly expanded the scope of the project. We organized the results below by the major categories of the analytical framework, describing the existing LG actions on nutrition with respect to governance, economic drivers of the food system, breastfeeding, food supply chain, retail and consumer services, consumer food environment, and other. We also identified areas where there are further opportunities for action.

Governance

Our research found only one example of a dedicated policy on healthy eating/nutrition: *Blacktown's Access to Fresh Food Policy* (Table 1).²⁷ This policy used a whole-of-government approach to increase the production and consumption of fresh, healthy, local food through measures such as education, supporting local food growers and businesses, and identifying priority populations and neighbourhoods for healthy eating initiatives.

Four local governments included food- or nutrition-related objectives in policy documents that were not food- or nutrition-specific, including whole-of-government documents such as community strategic plans. For example, the *Fairfield City Health Framework* aimed to develop the physical environment of Fairfield City "to be a liveable and healthy city, including the promotion of food and water security, good nutrition..." Under the theme of 'Community Wellbeing', it included the goal of "Being healthy and active", and the outcomes, "Good nutrition and healthy lifestyles" and "Providing information and education about healthy lifestyles, including nutrition..." One strategy for achieving these outcomes was "Ensuring people have access to healthy and culturally appropriate food".²⁶ While it was common to see targets or objectives related to nutrition in local government policies, the documents we identified in this study did not indicate if such objectives were translated into dedicated funding, organisation infrastructure, or comprehensive programs on diet-related health.

Breastfeeding

We found two mentions of local governments encouraging or supporting breastfeeding (City of Sydney and Fairfield). The *Fairfield City Health Framework* included the Strategic Direction of "Build in" Health – Land use and urban design'. Actions under this heading included supporting breastfeeding in public areas, restaurants, new retail and business developments, and workplaces.²⁶ However, this was not expressly identified as a local government responsibility.

Food supply chain

Five LGs reported measures supporting local or urban food production (Table 1). Four LGs also had dedicated policies supporting community gardens, while four permitted or grew food on local government land. For example, the Fairfield City Council *Annual Report 2009–10* mentioned that Fairfield had installed vegetable gardens, worm farms, and compost bins in a number of childcare centres and had developed a 'bush tucker' garden in Bonnyrigg Town Centre.²⁸

The *Penrith City Strategy* discussed the need to protect agricultural land, referring to the importance of local agricultural food production for the local economy and for community health and wellbeing.²⁹ Policies from Blacktown and Fairfield also mentioned the importance of protecting food-producing urban or peri-urban land.^{26–27} Initiatives on urban or local food growing were most often framed in terms of environmental sustainability or managing food waste, but sometimes mentioned nutrition or healthy eating as well.

We found only one LG with measures that aimed to strengthen local supply chains, with Blacktown's *Access to Fresh Food Policy* stating that Blacktown aimed to increase consumption of fresh, local produce, support local growers, and encourage participation in local fresh food initiatives such as farm gate sales.²⁷ Further, the Blacktown *Environmental Sustainability Policy* (2009) mentioned supporting local food initiatives and strengthening existing local food networks.³⁰

We found no mention of LGs engaging in initiatives related to processing and packaging, e.g. policies on product reformulation targeted at food manufacturers. However, managing and reducing food waste was a central concern for all LGs, forming part of their traditional responsibility for waste management.

Table 1: Extent to which local government policy documents contain actions related to food and nutrition. ^a							
Recommendation	Blacktown	City of Sydney	Fairfield	Ku-Ring-Gai	Penrith	Randwick	TOTAL
Governance^b							
Stakeholder participation in policy creation							1
Partnerships across council depts.							1
Nutrition/food-related objectives in gen. policies							4
Dedicated food/nutrition policies							1
Implementation plans/governance							1
Food/nutrition programs							1
Data collection							3
Identify/support community initiatives							2
External stakeholder engagement							4
Breastfeeding^c							
Encourage/require breastfeeding facilities in buildings/developments			*Not identified as council action				1
Supportive programs for staff/community members							1
Food supply chain							
Production^d							
Support animal husbandry							2
Protect agricultural land							1
Protect urban/peri-urban land for food growing			*Not identified as council action				2
Support urban/local food growing							5
Support/undertake food growing on council land							4
Community gardens policy							4
Support home gardening							5
Storage and distribution^e							
Strengthen local supply chains							1
Reduce food waste							6
Retail and consumer services							
Support markets selling fresh/healthy food							5
Support retailers/caterers to improve availability/affordability of healthier foods			*Not identified as council action				2
Healthy food retail on council land/properties							1
Healthy food procurement policies							2
Food environments							
Food availability and physical access^f							
Healthy food retail accessible by active transport							1
Healthy food sold/provided in council facilities/services or by contractors							1
Provide meal/food services/programs for disadvantaged groups							6
Use fees/grants to encourage food/nutrition initiatives							3
Promotion, advertising and information-based initiatives aimed a behavior change^g							
Events promoting healthy eating							1
Promote healthy eating/cooking/food prep. through education, information, demonstrations							6
Support healthy eating by employees							3
Food quality and safety^h							
Regulate food safety in restaurants/retail outlets							6

Table 1 cont.: Extent to which local government policy documents contain actions related to food and nutrition.^a

Recommendation	Blacktown	City of Sydney	Fairfield	Ku-Ring-Gai	Penrith	Randwick	TOTAL
Other							
Night markets							2
Food markets							1
Food tours							2
Food trucks							2
Food festivals							3
Night-time economy							2
Promote late-night dining							2
Encourage local dining scene							3
Food/cooking demos at festivals, showgrounds, sports events							2
Projects with CALD community							1
Create jobs in agriculture/food retail							1
TOTAL	24	23	20	9	17	16	109

Notes:

- a: Two categories with no actions were: (1) Economic environment, with recommendations: decent agricultural jobs; support solidarity activities; (2) Processing and packaging, with recommendations: support food processing businesses; policies on product reformulation/reducing portion size.
- b: Recommendations where no action found: Dedicated expert employees; organizational infrastructure; resourcing; staff training; review by-laws/policies to support nutrition; food resilience strategies.
- c: No action found: Supportive work conditions; ensure compliance with WHO Code on Marketing of Breastmilk Substitutes.
- d: No action found: Access to water foundations; guidelines on location of food production/processing businesses.
- e: No action found: Easily accessible food distribution centres; assess flow of food to/from cities.
- f: No action found: Encourage fresh food outlets/ restrict unhealthy food outlets; support community transport to fresh food outlets; provide food delivery services; regulation of community transport supports use for food shopping; access to safe drinking water; registered commercial kitchens in council-owned/run facilities; licensed premises have adequate food storage/preparation facilities; partner with sporting clubs to provide healthy choices.
- g: No action found: Promote local food initiatives; promote healthy food at council facilities; restrict unhealthy food marketing.
- h: No action found: Support food safety regulatory compliance by local community groups/small producers; use regulations to encourage retailers to improve the healthiness of foods; flexibly apply regulations to support production/sale of locally-produced food.

Randwick City Council participated in a major sustainability project with Waverly and Woollahra Councils that aimed to remove food waste from household rubbish bins (among other objectives), including by providing compost bins and worm farms, along with technical advice and other forms of support.³¹ Workshops and other initiatives on composting and worm farms were often framed as having food waste reduction objectives, as was support for programs such as OzHarvest.

Retail and consumer services

Documents from five LGs mentioned support for farmers' markets and other markets selling fresh, healthy food (Table 1). For example, the 2012–2022 *Fairfield City Plan* identified providing access to farmers' markets and food co-ops as a strategy under the theme of environmental sustainability.³² We found only two mentions of encouraging food retailers to improve the availability/affordability of healthy food. The *Fairfield City Health Framework* discussed the need to develop strategies to encourage food outlets to provide food that is not high in calories, but this was not explicitly identified as a local government responsibility.²⁶ Two policies

mentioned healthy food procurement by LGs: Blacktown City Council's *Access to Fresh Food Policy*,²⁷ and Fairfield City Council's healthy catering guidelines for food provided at local government meetings and events.³³

Consumer food environments

All local governments supported meal services or programs for disadvantaged groups. A wide variety of programs were mentioned in policy documents; our study did not identify differences in programs offered depending on LGs' level of socioeconomic advantage (Table 1). City of Sydney and Ku-Ring-Gai supported food redistribution programs such as SecondBite and OzHarvest,^{34–35} and Randwick City Council's *Operational Plan and Delivery Program 2017–2018* stated that Randwick was partnering with state agencies to establish a community hub and food bank.³⁶ City of Sydney and Penrith had policies on coordinating mobile free food services,^{37–38} and Fairfield City Council's 2012–2013 *Annual Report* described Fairfield partnering with a non-profit organisation to provide low-cost essential food to low-income older people and people with disabilities.³⁹ Documents from Fairfield and City of Sydney additionally

mentioned these LGs using grants to support organisations providing food to residents or involved in food advocacy.

All LGs promoted healthy eating, nutrition, or cooking and food production skills through information, education, workshops and demonstrations. Documents from Blacktown, Penrith, and Randwick also mentioned promoting healthy eating or nutrition to staff members. The *Penrith Community Plan 2017* included the objective of "[H]elp our community and our staff to understand healthy choices for exercise and nutrition."⁴⁰ The *Delivery Program 2017–2021* and *Operational Plan 2017–2018* stated that Penrith provided free health talks for staff members, including on weight loss.⁴¹

We found no mention of LGs encouraging the opening of fresh food outlets, nor of restricting the opening of unhealthy food outlets (Table 1). Only the City of Sydney's Community Strategic Plan mentioned connecting healthy food retail outlets with active transport. One of the plan's ten objectives was to ensure that all residents were within reasonable walking distance of local services including fresh food outlets.⁴² We found no mention of LGs restricting unhealthy food marketing through measures

within their jurisdiction, e.g. on infrastructure owned or managed by LGs.

All LGs reported activities related to food safety (as part of their shared responsibility for food safety with state governments), and they played a key role in enforcing regulation. The City of Sydney *2016–2017 Annual Report* described how the City initiated food safety prosecutions for unsafe food premises and was involved in prosecutions related to breaches of the Food Standards Code.⁴³ The City also partnered with the NSW Food Authority and ran retail and foodservice information sessions for local businesses. However, we found no mention of LGs using food regulatory schemes to encourage retailers to improve the healthiness of food, nor of flexibly applying food safety regulation to sell/grow locally-produced food, as recommended in the literature.

Other

Our analysis captured other mentions of food not explicitly related to diet or nutrition, including descriptions of food markets, food tours and food trucks (Table 1). Food events or activities were commonly framed as contributing to the local economy and supporting local businesses, as well as enhancing the vitality and attractiveness of local government areas. In Penrith, agri-food manufacturing and processes were identified as key growth areas for employment in the region.

Discussion

Our analysis found that all LGs took action on reducing food waste, providing food or meal services for disadvantaged groups, enforcing food safety regulation and promoting healthy eating, cooking or food production skills through education and information. A sub-set (4–5 LGs) also supported urban/local food production, community gardens, and markets selling fresh, healthy food, as well as permitting or growing food on LG land. These results firmly establish the important role that local governments play in improving nutrition in Australia. We also found that LGs focused on food- or nutrition-related issues that were relevant to their local government area. For example, Penrith's policy documents reflected a strong focus on agriculture and food production, an important part of Penrith's economy given its peri-urban location. Accordingly, there were similarities and differences between the actions taken

by different LGs in relation to food and nutrition, although we did not clearly identify differences based on level of socioeconomic advantage.

As we note above, constraints are placed on local government by state legislative frameworks. However, while LGs may lack powers such as taxation (apart from rates), our research demonstrated that they use a range of policy tools in their efforts to provide food to community members or to improve nutrition, including grants, education, information, and procurement policies. The recommendations from the Australian literature informing this study also point to other powers and functions that could be used by local governments to improve nutrition, such as including terms requiring the provision of healthy food in contracts with suppliers (e.g. of childcare or leisure services), or varying rates to support initiatives related to healthy eating (see Supplementary Appendix 1).

There were domains in which we found no evidence of local government action, including: food processing and packaging; using food safety regulation to encourage the provision of local, fresh food; restricting the opening of unhealthy food outlets/encouraging the opening of healthy food outlets; and restricting unhealthy food marketing. There was also very little mention of initiatives aimed at promoting or encouraging breastfeeding. It is possible that the six LGs used their local environment plans or development control plans to restrict unhealthy food outlets or unhealthy food marketing, with these documents excluded from the study. However, it seems unlikely that LGs would use planning instruments in this way without mentioning it in their other policy documents.

Most LGs included food- or nutrition-related objectives in documents such as community strategic plans, but we found only one dedicated policy on nutrition. Thus, while it was common for LGs to have discrete initiatives related to improving nutrition, we found limited evidence of a comprehensive, 'whole-of-government' approach to diet-related health. This is in contrast to cities in countries such as the US and UK, some of which have developed sophisticated food policies that address objectives such as improving nutrition as well as sustainability, social justice and economic development.^{16–19} As recommended by Australian and international studies,^{19,21}

there is scope for more urban (and rural) LGs in Australia to adopt comprehensive food policies that address all sectors and domains of the food system, and which link together existing actions on food system sustainability, economic development and nutrition. Such policies could also represent an opportunity for community and civil society participation in local food governance, particularly if developed or implemented by an institutional structure such as a food policy council. There may be nutrition-related initiatives undertaken by LGs that were not mentioned in the policy documents included in this study. A further limitation is that we were unable to determine the extent to which objectives or mentions in policy documents translated into programs and actions 'on the ground'.

There are clear synergies between the existing functions and legal remit of local governments and initiatives to improve diet-related health, which suggests that new measures aimed at improving nutrition could be integrated into pre-existing policies and activities.⁹ For example, LGs are heavily involved in land-use planning, which is relevant to nutrition, and there is considerable scope for marrying LGs' remit on land use with nutrition objectives, particularly for sustainable agriculture. Similarly, most LGs in the study already promoted or facilitated local or urban food production as a sustainability measure (a key feature of urban food policies in cities such as Toronto and London),¹⁸ and action in this area could be more explicitly linked to nutrition. There are also opportunities for LGs to model 'best practice' in encouraging good nutrition, given they are significant owners and managers of land and suppliers of services. One example of this is creating healthy food procurement policies; another is restricting unhealthy food marketing on property owned or managed by councils. Variation in the existing initiatives adopted by LGs also suggests there is an opportunity to share ideas and practice-based knowledge, possibly through dedicated inter-council symposia, or informal networking events on nutrition and urban food.

The fact that local governments were not implementing some of the internationally recommended actions for nutrition could reflect the division of power between local, state, and federal governments in Australia, and the constraints on local government powers. In NSW, the NSW Food Authority

leads regulatory action on food safety, and it seems unlikely that LGs would introduce dietary health initiatives using the food regulatory framework without its leadership. However, there is little Australian research that describes in detail the functions and powers of LGs with reference to the legislative environment within which they operate, and how these functions and powers relate to nutrition. There is a clear need for further research that analyses the legal, regulatory and fiscal powers of LGs and how these powers might be leveraged to improve diet-related health.¹²

The somewhat limited local government action on nutrition we observed could be an effect of political and economic as well as legal barriers. One of the recommendations informing this study is that LGs use planning and other tools to restrict the opening of unhealthy food outlets. Although not included in this study, local environment plans and development control plans form one component of a complex planning regime and must be implemented according to state-level planning instruments. Most state planning laws do not contain objectives related to health promotion (as described above), which may constrain councils' abilities to use these tools to promote diet-related health.⁷ There are examples of courts overturning council refusals to grant planning permission to fast-food outlets,⁴⁴ and it could be that councils experience 'policy chill' as decision-makers anticipate significant industry resistance and potentially costly litigation in attempting to use planning instruments to improve diet-related health. As has occurred in the international literature, further research is needed on the political and economic (and legislative) barriers that Australian councils may face in using their powers and functions in practice, as well as on the factors that enable food policy-making by Australian LGs.

Conclusion

The six LGs included in the study reported a range of actions relevant to promoting a healthy food supply and consumer food environment, with key actions focused on reducing food waste, enforcing food safety regulation, and supporting urban/local food production and markets selling fresh, healthy food. However, we found opportunities for further action in several areas, including product reformulation,

encouraging healthy food outlets/restricting unhealthy food outlets, restricting unhealthy food marketing, and flexibly applying food regulations to promote good nutrition. This study also identified an opportunity for a more comprehensive 'whole-of-government' approach to food and nutrition policy-making by LGs. Further research is needed to understand the legislative and political constraints on Australian local governments, and how they can best leverage their powers and functions to encourage good nutrition within these constraints. Future studies should also assess the extent to which initiatives or objectives contained in policy documents translate into action 'on the ground'.

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Supporting Information

Additional supporting information may be found in the online version of this article:

Supplementary Appendix 1:

Recommendations for local government action on improving nutrition from Australian literature.

Supplementary Appendix 2:

Recommendations for government action for improving nutrition from international governance documents.

Supplementary Appendix 3: Council policy documents included in study.