

Submission to the Australian Government Department of Agriculture, Fisheries and Forestry's Feeding Australia: National Food Security Strategy

Executive Summary

The World Benchmarking Alliance (WBA) is a global, independent non-profit that assesses the top 2000 most influential companies for their contributions to sustainable development. Our benchmarks span food and agriculture, nature, climate, human rights, just transition, and digital inclusion. They are public, free to access, and provide evidence on trends and insights for accountability and policy design.

Australia's food system faces significant risks and costs. The CSIRO estimates AUD\$274 billion in hidden costs annually, including AUD\$225 billion from environmental degradation and AUD\$49 billion from poor diets and health outcomes.¹ These costs demonstrate that food security cannot be addressed through productivity alone; systemic risks must be managed.

WBA welcomes the inclusion of a whole-of-system principle in Australia's proposed National Food Security Strategy (NFSS), recognising that communities, producers, consumers, government and companies all play interconnected roles – although with differentiated responsibilities. In this submission, WBA highlights the need for **corporate transparency and accountability to be embedded in the NFSS**, given that company decisions influence every stage of the value chain, from how food is produced to what reaches consumers, and under what conditions. Companies shape land-use change, emissions, producer livelihoods, job quality, and nutritional environments, and they must also **manage overlapping transitions in climate, nature, human rights, and digital technologies**. Addressing these separately can create negative unintended consequences in Australia's food system.

Embedding clear expectations for company contributions within the NFSS will ensure they play their part in building a resilient and equitable food system.

Companies play a decisive role in shaping food systems

Australia's food system cannot be separated from its environmental, social, spiritual, technological and geopolitical context. This complexity means any single-focused intervention risks trade-offs or unintended impacts across actors and scales. Within this system, Australian companies are not just one actor but often sit centre stage in driving transformation. The dominance of a few large agribusinesses and retailers illustrates their power: two supermarket chains, Woolworths and Coles, control more than 65% of the domestic grocery market shaping what Australians eat and how farmers are paid.² Australia is also among the world's top exporters of beef and wheat,³ placing its companies at the centre of both domestic supply chains and global food markets. They depend on extensive land and water resources, contribute to national greenhouse gas emissions, and directly affect the livelihoods of farmers, workers and Indigenous

¹ Godde C, Abebe F, Navarro J and Lord S (2025) Insight 9: Hidden costs. In: Nelson R, Lim-Camacho L and Robinson C (eds) Towards a state of the food system report for Australia. CSIRO, Australia, p.1.

² Australian Council of trade Unions (2024), *Inquiry into Price Gouging and Unfair Practices Final Report*, p. 53.

³ Department of Foreign Affairs and Trade (DFAT), *Australia's Top 24 Exports, Good and Services*. Accessed 16 September 2025.

communities.⁴ Their scale, market concentration and integration into global value chains position them as critical actors in determining whether Australia's food system can deliver equitable, sustainable outcomes for people and planet - or reinforce existing vulnerabilities.

At the UN Food Systems Summit (UNFSS) Stocktaking Moment in 2023, the UN Secretary-General emphasised the need for stronger private sector engagement and accountability, leading to the development of a *Corporate Accountability Framework for Food Systems Transformation*.⁵ This call resonates strongly in Australia, where a handful of companies hold concentrated market power and shape outcomes across the food system. Answering that call means accountability cannot stop at disclosure, it must drive governance, ambitious targets and measurable results across climate, nature and equity. Existing tools and frameworks⁶ including WBA and The Food Foundation's *Food Industry Benchmarking Toolkit*⁷ reinforce how this can be embedded into national strategies.

Embedding corporate accountability within the NFSS is essential to ensure that Australia's most powerful food system actors drive equitable and sustainable outcomes.

Corporate accountability must be embedded throughout the NFSS principles and priority areas

WBA recommends embedding corporate transparency and accountability as core fundamentals of the NFSS. This is in recognition of the critical role industry plays under the whole-of-system principle, its relevance within each priority area and its impact and relationship with nature, climate and people.

WBA's Food and Agriculture Benchmark provides evidence of how companies with significant market power are performing against the responsibility to drive systemic change. The benchmark has 41 indicators split across four measurement areas: Healthy food systems, Sustainable food systems, Inclusive food systems and Governance. It is designed to assess how the world's most influential food and agriculture companies are contributing to the transformation of food systems, so they are more sustainable, equitable and resilient. Five Australian companies were assessed in the 2023 Food and Agriculture Benchmark including Woolworths, Coles, Nufarm, Inghams and GrainCorp. Australian companies scored an average of 29/100, slightly higher than the global average of 17/100,⁸ yet still far from demonstrating meaningful action.

Four out of the five Australian food and agriculture companies publish sustainability strategies; however, no company has targets that cover all priority issues. Climate is the dominant focus, while biodiversity, water, nutrition, and social equity receive far less attention. For instance, three of the five Australian companies have a time-bound target to reduce Scope 1 and 2 emissions, while zero companies have time-bound targets related to ecosystem restoration, or targets to ensure all their relevant high-risk commodities are ecosystem conversion-free.⁹

⁴ Department of Climate Change, Energy, the Environment and Water, (2021). *Industry. In Australia State of the Environment*.

⁵ United Nations Food System Hub (2024), *Corporate Accountability for Food Systems Transformation*.

⁶ See page 6.

⁷ World Benchmarking Alliance (2024), *Food Industry Benchmarking Toolkit*.

⁸ World Benchmarking Alliance, *Total ranking*, accessed 16 September 2025.

⁹ World Benchmarking Alliance (2023), *Food and Agriculture Benchmark data set*.

These results highlight that companies need to do better at disclosing their impacts on the food system, as well as the measures they are taking to improve their social, environmental, and nutrition outcomes. This reinforces the importance of embedding corporate accountability across the NFSS principles and priority areas so that company action contributes to whole-of-system transformation.

WBA recommends that nature be explicitly integrated into the NFSS priority areas in section 3.1. alongside climate change and sustainability, with mandatory requirements for companies to disclose their risks, impacts and dependencies.

Nature and climate are determinants of food security. The Kunming-Montreal Global Biodiversity Framework (GBF) Target 15 requires governments to ensure that large and transnational companies regularly monitor, assess and disclose their risks, dependencies and impacts on biodiversity. We know that biodiversity loss, water stress, and soil degradation directly undermine food production. Linking GBF commitments to the NFSS would help ensure that Australia's food system strategy aligns with international corporate accountability obligations and strengthens resilience.

Australia's Murray–Darling Basin is highly vulnerable to climate change, with projected impacts including reduced streamflow, more frequent droughts, and changing water quality.¹⁰ The Basin supports 7,300 irrigated agriculture businesses and accounts for more than two-thirds of Australia's irrigation water to grow food and fibre,¹¹ meaning ecosystem decline threatens both production and the communities that depend on it. Climate change imposes AUD\$21 billion in hidden costs annually through its impact on Australia's agriculture,¹² highlighting the importance of protecting ecosystems and biodiversity within national food strategies.

The pressures facing the Murray–Darling Basin illustrate how corporate decisions can either worsen or alleviate these risks. Agribusinesses and input providers hold outsized influence through the choices they make on seeds, fertilisers, pesticides, and more, which shape Australia's natural environment. The Sustainable Food Systems indicators in WBA's benchmark reinforce that companies should adopt measurable commitments throughout their supply chains on soil health, water use, water pollution, emissions, ecosystem protection and restoration, food loss and waste, and plastic use. For example, four out of five Australian companies assessed by WBA refer to qualitative efforts to improve soil health or agrobiodiversity in its production and/or sourcing practices, yet none set quantitative targets or disclose progress against these indicators,¹³ showing a persistent gap between stated commitments and the adoption of measurable targets and disclosures necessary for effective accountability.

¹⁰ Zhang, Y, Vaze, J, Crosbie, R, Peña-Arancibia, J & Wang, B (2024), Review of climate change impacts on water quantity and quality in the Murray–Darling Basin. Accessed 29 September 2025.

¹¹ Murray-Darling Basin Authority, Water Use. Accessed 29 September 2025.

¹² Godde C, Abebe F, Navarro J and Lord S (2025) Insight 9: Hidden costs. In: Nelson R, Lim-Camacho L and Robinson C (eds) *Towards a state of the food system report for Australia*. CSIRO, Australia, p 83.

¹³ World Benchmarking Alliance (2023), *Food and Agriculture Benchmark data set*.

Embedding nature requirements in the NFSS would help to ensure corporate actions deliver tangible outcomes and directly safeguard the natural systems that underpin Australia's food security.

WBA recommends that the NFSS require companies to demonstrate their plans and actions to promote inclusive food systems, including how they support living incomes and fair labour conditions for farmers and workers across their supply chains by setting clear targets, disclosure of progress, and evidence of stakeholder engagement.

On the social level, corporate labour practices, sourcing decisions, and treatment of farmers and workers determine whether food systems are inclusive and resilient, or exploitative and fragile. Living incomes, fair wages, and safe working conditions are critical for the people who will be affected by the NFSS, both in its local and global food supply chains. Yet WBA finds that 64% of global food companies fail to disclose activities supporting living incomes for farmers' or fishers' living income,¹⁴ the very actors who produce much of the world's food but remain among the most vulnerable. Australian companies perform even more poorly, with an average score of just 0.3% on living income indicators compared to the global average of 11%. This gap undermines the resilience of farmers and the communities they support.

International standards, including the United Nations Guiding Principles on Business and Human Rights and the International Covenant on Economic, Social and Cultural Rights, affirm that companies have a responsibility to respect the right to food, which encompasses fair incomes and decent working conditions across their value chains.

WBA recommends First Nations voices be brought to the forefront of the NFSS. This means not only embedding Free, Prior and Informed Consent (FPIC) as a minimum standard in corporate practice but establishing governance structures that centre First Nations leadership and decision-making, supported with adequate resourcing.

WBA benchmark findings show insufficient evidence of Australian food and agriculture companies disclosing and describing how they obtain Indigenous Peoples' FPIC regarding whether and how to carry out projects.¹⁵ Yet recognition of these rights is affirmed both domestically and internationally: the Australian Government affirmed the significance of First Nations knowledge systems in shaping food systems,¹⁶ while the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) sets FPIC as a minimum standard for Indigenous Peoples' survival, dignity and well-being.

Despite this recognition, the NFSS does not yet demonstrate how Indigenous rights will be embedded in practice. It must therefore establish First Nations leadership, FPIC, and resourced governance as binding standards of accountability across Australia's food system.

WBA recommends that the NFSS requires companies to demonstrate how they are contributing to healthy food systems by disclosing time-bound commitments, including targets and progress, on nutrition-sensitive

¹⁴ World Benchmarking Alliance (2024), *Transforming Food Systems with Small-Scale Producers*, p.3.

¹⁵ World benchmarking Alliance (2022-2024), *Nature Benchmark data set*.

¹⁶ Department of Agriculture, Fisheries and Forestry (2025), *National Food Security Strategy: discussion paper*, p. iii.

agriculture, product reformulation, protein diversification, responsible marketing and labelling, nutrition, food safety, and animal welfare. The Australian Government should set clear regulatory guardrails where industry voluntary action is not enough.

WBA recognises that food systems must support healthy, sustainable diets and protect public health. The latest UNICEF *Feeding Profit* (2025) report shows that the dominance of ultra-processed foods in children's diets is driving poor nutrition and escalating health costs. For example, "traditional diets – rooted in whole and minimally processed staples and freshly prepared meals – are increasingly being replaced by nutrient-poor unhealthy diets dominated by ultra-processed foods and beverages",¹⁷ and in adolescents aged 15-19 in countries such as Australia, ultra-processed foods and beverages contribute at least half of total energy intake.¹⁸

The *Healthy Food Systems* indicators in WBA's Food and Agriculture Benchmark assess whether companies adopt measurable nutrition commitments and actions. For example, responsible marketing is one indicator. Three companies (Coles, Woolworths, and Inghams) were assessed across responsible marketing elements to-date. Of these, Woolworths was the only company to disclose activities promoting healthier product options, through its *Making Healthier Easier* hub. While one company disclosed that they do not target children in its advertising of food and/or beverage items that do not meet the Food Standards Australia Nutrient Profiling Scoring Criterion (NPSC), none of the assessed companies disclosed the proportion of their marketing budgets spent on healthier foods, and none provided evidence of third-party auditing of marketing practices. These findings indicate that current voluntary approaches are inadequate and stronger regulation is needed.

Stronger corporate accountability within the NFSS on the above elements is essential to improve nutrition, reduce health costs (approximately AUD\$49 billion from poor diets and health outcomes¹⁹), and build a resilient food system.

WBA initiatives demonstrate pathways to healthier, more sustainable food systems

In 2026, WBA will publish assessments across all 2,000 companies in its benchmarks, updated biannually to track progress toward sustainable development. The Food and Agriculture Benchmark provide a roadmap to healthy, inclusive and sustainable food systems, assessing 350 of the most influential companies on issues critical to transformation. WBA can produce an Australian-specific cut of the Food & Agriculture indicators for companies operating in or impacting Australia and the region, enabling the NFSS to track corporate performance insights and trends regularly.

More broadly, WBA will bring together results and insights from across a range of our methodologies (including [ACT Core](#), [Nature benchmark](#), [Core Social Indicators](#), [Just transition](#)) to support companies to take a more integrated approach across climate, nature and social issues. Global momentum is also building:

¹⁷ UNICEF (2025) *Feeding Profit*, p.11.

¹⁸ UNICEF (2025) *Feeding Profit*, p.3.

¹⁹ Godde C, Abebe F, Navarro J and Lord S (2025) Insight 9: Hidden costs. In: Nelson R, Lim-Camacho L and Robinson C (eds) *Towards a state of the food system report for Australia*. CSIRO, Australia, p.1.

standard setters and civil society, including the Transition Plan Taskforce (TPT), Worldwide Fund for Nature (WWF) and Taskforce on Nature-related Financial Disclosures (TNFD), are all advancing guidance on integrated climate and nature transition planning.

Ensuring global alignment and inclusive governance will allow the NFSS to address food system challenges comprehensively

WBA recommends that the NFSS aligns with international, evidence-based frameworks on food systems that embed corporate accountability and transparency. This alignment will help address any challenges the NFSS may face by drawing on the best global practice and ensuring consistency with internationally recognised standards.

This includes, but is not limited to:

- World Benchmarking Alliance (2025) Food and Agriculture Benchmark.
- United Nations Food Systems Summit (2024). Corporate Accountability for Food Systems Transformation: A roadmap and guidance towards UNFSS+4 and beyond
- Food and Agriculture Organisation of the United Nations (2025). Implementing National Food Systems Pathways: Emerging Practices
- Convention on Biological Diversity (2022). Kunming-Montreal Global Biodiversity Framework.
- Taskforce on Nature-related Financial Disclosures (2023). Recommendations of the Taskforce on Nature-related Financial Disclosures.
- United Nations (2011). Guiding Principles on Business and Human Rights.

WBA recommends the National Food Council is made up of whole-of-system actors to strengthen the implementation of the whole-of-system principle in the strategy.

Key design features:

- **Inclusive membership:** First Nations, people with lived experience, farmers, business, NGOs, academics and other actors from civil society.
- **Accountability:** The NFSS, starting with members, should encourage resilient supply chains by commencing with the requirement for Council members to disclosure on the recommendations listed in this submission.
- **Independent monitoring:** Establish a clear mandate to oversee NFSS implementation, supported by independent data. WBA's benchmarks demonstrate how monitoring company performance provides transparency and accountability, highlighting the value of independent, evidence-based oversight.

Conclusion

WBA thanks the Australian Government for its investment in developing the NFSS. By holding companies to account for their role across food systems, Australia can strengthen resilience, support equitable outcomes, and align with global commitments on climate, nature, and human rights. WBA looks forward to contributing evidence and insights from its benchmarks to support this important work.