AUSTRALIAN RETAIL COUNCIL

Let's talk shop.

Level 29
31 Market Street
Sydney NSW 2000

Submission to Preventive Health SA

July 2026

The Australian Retail Council (ARC) welcomes the opportunity to provide feedback to Preventive Health SA on its Strategic Plan for Preventive Health Action 2026-2034, *Healthier South Australians across generations.*

ARC represents the Australian retail sector. Valued at $444 billion, retail supports more than 1.5 million jobs, including employing more young Australians than any other industry. Retail is embedded throughout the economy and plays a critical role in the supply chain of Australian businesses. ARC advocates for polices and reform that drive growth, resilience, and long-term prosperity for Australian retail and the millions who rely on it.

General comments

The Australian Retail Council supports the South Australian Government's long-term commitment to preventive health and recognises the importance of shaping environments to make healthy choices easier.

Australians consistently engage with retailers. Retail settings are a primary interface between policy design and everyday consumer behaviour. The retail sector includes supermarkets, specialty food retailers and quick service restaurants (QSRs), operating within established national food safety, consumer information and planning regulatory frameworks. Food service retailers are therefore regulated participants in the retail ecosystem rather than distinct or unregulated environments.

ARC is committed to working with Government and policymakers to ensure that policy is evidence-based and proportionate, policy objectives are achievable and unintended consequences or impacts are avoided. In relation to the proposed Strategic Plan, we believe:

- the evidentiary basis for the Plan should be transparent
- references to "healthy" products and environments should be anchored to existing national standards to avoid ambiguity and aid enforcement.

ARC responses to the Consultation Questions

1. Overall, how well does the draft Strategic Plan explain what Preventive Health SA is trying to achieve and how they plan to achieve it? What would make it clearer or easier to understand?

To make the Strategy clearer and easier to understand, ARC recommends that key terms be properly defined and supported by recognised evidence.

The Strategy uses terms such as "unhealthy food and drink", "poor nutrition", "unhealthy food environments" and "healthy foods" but does not clearly explain what these mean. Without clear definitions, these terms could be interpreted in different ways. The Strategy should use recognised tools such as the Australian Dietary Guidelines (ADG), Food Standards Australia New Zealand's Nutrient Profile Scoring Criterion (NPSC) and the Australian Government's Health Star Rating (HSR) system to explain what is meant by healthier and less healthy foods and drinks.

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The Strategy should also define "overweight and obesity". Based on references, ARC understands these terms may be based on Body Mass Index (BMI). BMI is commonly used, but it has limitations. Other measures, such as waist-to-height ratio, could also be considered alongside BMI (Ref 1).

The term "unhealthy food environments" also needs to be clearer. ARC notes that a recent systematic review and meta-analysis found no statistically significant link between fast-food outlet density, including Quick Service Restaurants, and obesity outcomes (OR 1.01, 95% CI 0.99–1.04) (Ref 2). This suggests that claims about food environments should be supported by strong evidence.

It appears that the primary rationale for the Strategy appears to rely on the claim that "Health conditions like heart disease, diabetes and cancer are becoming more common." This should be stated more carefully. For example, age-standardised diabetes incidence and prevalence rates are both decreasing in Australia (Ref 3). Broad claims about increasing chronic disease should therefore be supported by clear and balanced evidence.

Finally, ARC recommends that the Strategy cite and explain how evidence will be assessed and used in policy decisions. This is important because public health research can vary in quality. The Strategy should consider:

- the quality of evidence
- the causal relationship between an intervention and an outcome, for example, the effect of advertising restrictions on health outcomes
- whether regulation is proportionate to the problem
- economic and affordability impacts.

2. How well does the draft Strategic Plan reflect the needs and experiences of the people and communities you know or work with, including Aboriginal people and other groups who experience inequity? What does success look like and what changes would make it more relevant and workable in practice for you or your organisation?

While not a specific community, a significant proportion of Australians (13.2% of households) are experiencing food insecurity. Research shows that food insecurity is more common among lower-income households, renters, single-parent families, households affected by disability or health issues, and some Aboriginal and Torres Strait Islander households (Ref 4).

Food security and affordability policies should be guided by recognised national nutrition benchmarks, including the Australian Dietary Guidelines (ADGs), Nutrient Profile Scoring Criterion (NPSC) and Health Star Rating (HSR) system.

ARC supports further consideration of targeted measures for people most at risk of food insecurity, including:

- targeted food subsidies
- school breakfast and lunch programs
- nutrition education initiatives.

Retailers should also be formally recognised as important delivery partners. Retail settings are where many consumers make food choices, and retailers already help implement national labelling requirements and voluntary codes of practice. Working closely with the retail sector would help ensure policies are practical, reduce unintended consequences, and improve implementation.

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3. Is there anything else you would like to tell us about the draft Strategic Plan, or any other suggestions you have to strengthen preventive health action in South Australia?

While foods and beverages are discussed throughout the Strategy, long-term dietary patterns are not explicitly addressed. Scientific evidence demonstrates that overall dietary patterns are stronger predictors of health outcomes than individual foods, nutrients or retail formats. Healthy dietary patterns are associated with improved longevity and reduced chronic disease risk (Refs 5–6).

Rather than targeting individual food products or retail categories policy interventions should therefore prioritise:

- sustained dietary behaviours
- nutrition literacy
- affordability and access.

Population health target 8 (Reduce the proportion of children and adults' total energy intake from discretionary foods from >30% to <20% by 2030) is problematic. Discretionary food consumption has decreased from 36.3% of energy in 1995 to 30.5% of energy amongst adults in 2023 (Ref 7). Therefore, a further ~33% reduction in less than 4 years is very optimistic and unlikely to be achievable.

Finally, the proposed aspiration of "creating a smoke-free generation" is unlikely to be achievable. A more realistic framing would focus on continued reduction of smoking and vaping incidence and prevalence. Subject to flexibility regarding the size and colour of the HSR symbol, ARC supports the FSANZ recommendation to voluntarily label foods in small packages (<100 cm2) with an NIP and HSR.

Please direct any queries in relation to this submission to our policy team at policy@retail.org.au.

About ARC

ARC represents the Australian retail sector. Valued at $444 billion, retail is the nation's second largest private sector employer, supporting more than 1.5 million jobs, including more young Australians aged 15 to 24 years than any other industry. ARC's membership is diverse. From family-owned small and independent businesses, comprising 95 per cent of our membership, to large national and international retailers supporting communities across metropolitan and regional Australia. With more than 155,000 retail outlets nationwide and a growing online presence, the retail sector is embedded throughout the economy, playing a critical role in the supply chain of Australian businesses. ARC advocates for polices and reform that drive growth, resilience, and long-term prosperity for Australian retail and the millions who rely on it. At a time of rapid change, from technological disruption and international competition to shifting consumer behaviour and sustainability expectations, effective policy settings are critical for retailers, workers, consumers, and communities.

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