

## Alice Springs Dietitians Submission

### ***Re: National Strategy for Food Insecurity in Remote First Nations Communities***

#### **Background**

The School Nutrition Program's (SNP) key objective is to improve school attendance and learning outcomes by providing recipients with meals and snacks during school hours which comply with the Northern Territory (NT) Department of Education's *School Nutrition and Healthy Eating Policy* which was formulated from national guidelines regarding food provided in schools. The Territory-wide policy stipulates that,

*'All school nutrition and breakfast programs must comply with food and drink categories. A large variety of food and drinks from the **green - always on the menu** category must be available every day and be the main choices on the menu. Any food or drinks categorised as **red - not on the menu**, must not be sold or provided to students (Department of Education, 2023).'*

Under the Modified Monash Model, Alice Springs is considered a remote community, with a Modified Monash score of 6 (Department of Health, 2019). There are approximately 250 students across seven schools in Alice Springs receiving the SNP. The Alice Springs SNP operates with a manager and a few general positions involving cooking, packaging and transportation. The program is delivered by the Australian Rural & Regional Community Service (ARRCS) who receive funding from the National Indigenous Australians Agency (NIAA) in addition to weekly copayments from students' parents and caregivers. As per the Australian Government's Services [information page](#) income managed money may be used to pay for a 'healthy meal' at their child's school (Services Australia, 2023). Through the ARRCS-delivered SNP, students receive a morning tea snack and a main meal.

Historically, urban dietitians have attempted to review the program for nutritional adequacy against the above standards to support the nutrition and overall health status of the students. Most recently, engagement with SNP Providers has been challenging, as can be seen from the following evidence wherein it has been difficult to impact meaningful and long-term improvements to the program.

As a result, Alice Springs Dietitians\* have collaborated to create this submission to bring awareness to this program, address concerns and formulate recommendations, as well as work collaboratively with ARRCS and NIAA to continue to support and improve the Alice Springs SNP for local students.

\*Alice Springs Dietitians consists of support from the Alice Springs Hospital Dietetics Department and the Urban Nutrition Service (Primary & Public Health Care). The Central Australian Aboriginal Congress are not included in this umbrella term, but have provided a letter of support for this submission (see attached documents).

**Evidence**

*Provided Meals (September 2023)*

Meal 1 - GREEN	Meal 2	Meal 3	Meal 4
AMBER	GREEN*	AMBER	RED
			
Meal 5	Meal 6	Meal 7	
GREEN*	AMBER	GREEN*	
			

\*If lean meat and/or low-fat cheese was used.

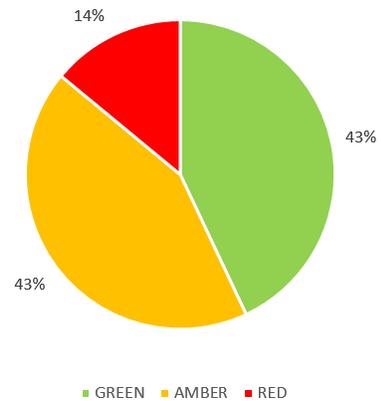
**Results**

Most meals provided during this time were either GREEN (43%) or AMBER (43%). It should be noted that all GREEN meals may be considered AMBER if lean meats and/or low-fat cheese were not used. AMBER meals were categorised as such due to lack of lean meat (e.g. use of meatballs, chicken tenders and chicken drumsticks including skin). Increased vegetable content and use of lean meats would help to provide a larger variety of GREEN meal items, as required by the aforementioned guidelines.

One RED meal (14%) was provided, which was a potato top beef mince pie. It is understood that meat pies or sausages rolls are often provided on a Monday as the SNP Provider has reduced preparation time, and as it is quicker to assemble compared to other meals. Alice Springs Dietitians find this to be unacceptable, and local dietetic services have constructed lists of alternative meals which could be prepared in a similar amount of time; however, these were not implemented.

Additionally, the NT's School Nutrition and Healthy Eating Policy's Recipe Checklist describes that healthy recipes suitable for sale will '[contain] plenty of vegetables - these can be fresh, frozen or canned' (Department of Education, 2023). Of the above recipes, only 57% contain visible vegetables.

Categorisation of Meals



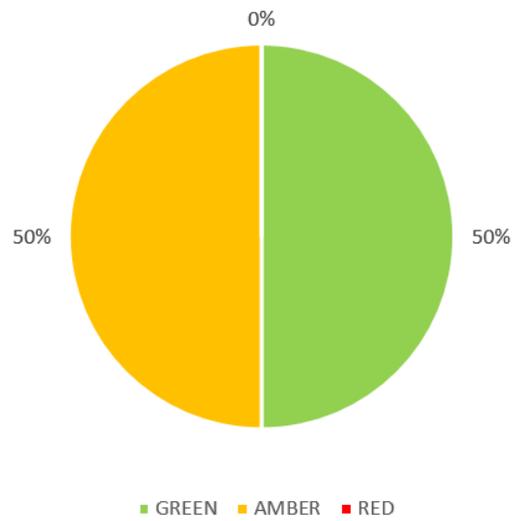
Provided Snacks (September 2023)

Snack 1	Snack 2
AMBER	GREEN
	

Results

At this time, only two photos of snack menu items were documented. Due to the full fat content of the above yoghurt (Snack 1), this product was deemed AMBER (50%). Alternatively, the apple and carrots were both categorised as GREEN (50%).

Categorisation of Snacks



Provided Meals (March 2024)

Meal 1	Meal 2	Meal 3	Meal 4	Meal 5
GREEN*	AMBER	AMBER	RED	AMBER
				
Meal 6	Meal 6	Meal 8	Meal 9	Meal 10
GREEN*	GREEN*	RED	GREEN*	GREEN*
				

\*If lean meat and/or low-fat cheese was used.

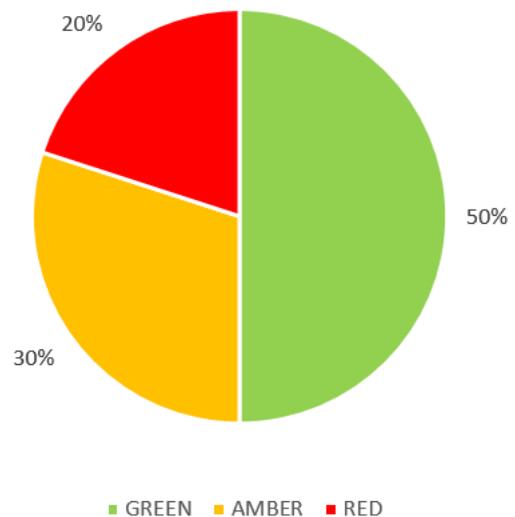
Results

Half of the meals (50%) offered are categorised as GREEN, which is a credit to the increased vegetable content and reduced saturated fat content of these meals. However, if these meals were not prepared with lean meat and/or low-fat cheese, these would be considered AMBER.

The next highest proportion of meals (30%) were considered AMBER, which is mostly due to the protein source within the meal containing high amounts of saturated fat (e.g. burger patty, ham and chicken drumstick including skin). There were two RED meals (20%), these were categorised as such because of the absence of vegetable content, high saturated fat content and non-lean protein source. As described in the evidence from September 2023, the provision of RED menu items within this program is unacceptable.

Additionally, the NT's School Nutrition and Healthy Eating Policy's Recipe Checklist describes that healthy recipes suitable for sale will '[contain] plenty of vegetables - these can be fresh, frozen or canned' (Department of Education, 2023). Of the above recipes, 80% contain visible vegetables, which is the highest percentage of these documented time periods.

Categorisation of Meals



Provided Snacks (March 2024)

Snack 1	Snack 2	Meal 3	Meal 4	Meal 5
RED	GREEN	AMBER	RED	AMBER
Snack 1	Snack 2	Snack 3	Snack 4	Snack 5
AMBER	GREEN	RED	RED	RED

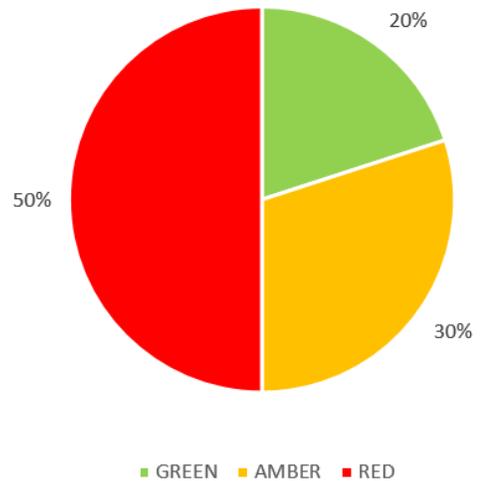
Results

Half of the snacks (50%) provided within this documented period were categorised as RED. This is due to many of the snack products containing confectionery (e.g. white chocolate coating), as well as excessive amounts of sugar. Once again, RED snack products should be offered on the SNP menu. AMBER items were the next highest percent of snack products (30%), which consisted of snacks that have somewhat low nutritional quality with low protein and dietary fibre, but are not as high in sugar, sodium or saturated fats as other RED products.

Notably, the guidelines highlight that GREEN products should compose a large variety of menu options. In this documented period, GREEN products were offered the least (20%).

The RED products are repeated up to three times during this two-week period, however if the GREEN options were repeated more consistently and replaced the RED items, this would assist with increasing GREEN options within the menu to adhere to the associated guidelines.

Categorisation of Snacks



Provided Meals (July 2024)

Meal 1	Meal 2	Meal 3	Meal 4
GREEN*	AMBER	AMBER	AMBER
			
Meal 5	Meal 6	Meal 7	Meal 8
AMBER	GREEN*	GREEN*	RED
			

\*If lean meat and/or low-fat cheese was used.

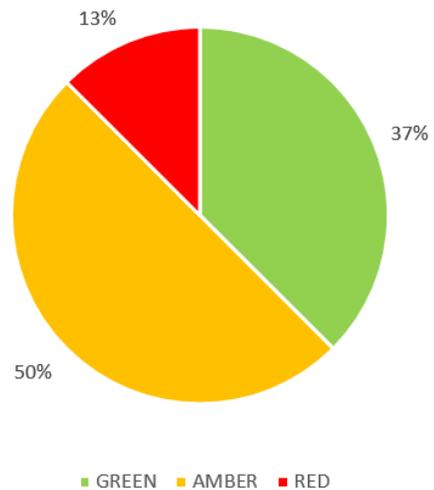
Results

The meals provided are mostly categorised as AMBER (50%), this is because of the protein components containing saturated fats, including ham, chicken wings (including skin) as well as burger patties. The appropriate guidelines state that AMBER meals and snacks should not dominate the menu, as a large variety of GREEN items should be available every day.

With regards to the GREEN meals (37%), these could all be classified as AMBER if low-fat cheese or lean meat was not used to prepare them. If this was the case, then in this selection of meals, there would not be any meals categorised as GREEN. There is one RED meal (13%) available within this documented period, and as stated in the previous evidence sections, the provision of RED menu items within this program is unacceptable.

Additionally, the NT's School Nutrition and Healthy Eating Policy's Recipe Checklist describes that healthy recipes suitable for sale will '[contain] plenty of vegetables - these can be fresh, frozen or canned' (Department of Education, 2023). Of the above recipes, only 63% contain visible vegetables.

Categorisation of Meals



Provided Snacks (July 2024)

Snack 1	Snack 2	Snack 3	Snack 4
GREEN	RED	RED	AMBER
			
Snack 5	Snack 6 (Banana not pictured)	Snack 7	
RED	AMBER*	RED	
	 *Coles Yoghurt is GREEN		

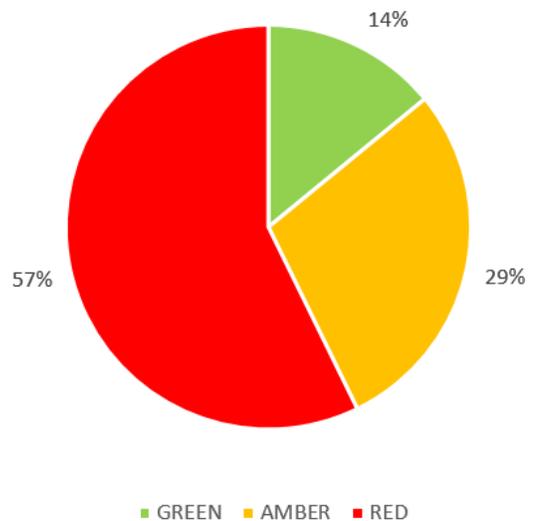
Results

The snacks provided are mostly categorised as RED (57%), which as previously stated should not be available through this program. This is mostly due to many of the snack products containing confectionery (e.g. white chocolate coating), as well as excessive amounts of sugar and salt.

AMBER snack options make up the next largest proportion of snacks (29%). However, some of the AMBER snacks could be modified to GREEN, particularly if yoghurts selected contained skim or reduced fat milk instead of full fat.

Notably, GREEN snack options make up the lowest proportion (14%) of offered items. As previously stated, menu items should largely consist of GREEN items and be offered every day.

Categorisation of Snacks



Provided Menus

August 2022

Monday 15/8/22	Tuesday 16/8/22	Wednesday 17/8/22	Thursday 18/8/22	Friday 19/8/22
Pies Fruit Pop Corn	Savoury Mince and Baked Potatoes Fruit Salad Banana Bread	Mixed Sandwiches Fruit Shapes	Chicken Pasta Bake Fruit <u>Le Snaks</u>	Hamburgers and Salad Fruit Milo Bars
Monday 22/8/22	Tuesday 23/8/22	Wednesday 24/8/22	Thursday 25/8/22	Friday 26/8/22
Pies Fruit Pop Corn	Marinated Chicken Drumsticks and Fried Rice Fruit Salad Banana Bread	Mixed Sandwiches Fruit Shapes	Sausages, Baked Potatoes, Veggies and Gravy. Fruit <u>Le Snaks</u>	Chicken Strips, Cheese, and Lettuce Rolls Fruit Milo Bars

February 2024

Monday 29/1/24	Tuesday 30/1/24	Wednesday 31/1/24	Thursday 1/2/24	Friday 2/2/24
PUPIL  FREE  DAY	Lasagne Fruit Pop Corn	Ham, Cheese, Carrot, Lettuce Roll Fruit Boiled Egg/Carrot Sticks	Butter Chicken and Veggies with Rice Fruit Messy Monkeys	Hamburgers with Cheese and Salad Fruit <u>Lite</u> Cheese and Crackers
Monday 5/2/24	Tuesday 6/2/24	Wednesday 7/2/24	Thursday 8/2/24	Friday 9/2/24
Chicken, Vegetables and Noodles Fruit Yoghurt	Marinated Chicken Drumsticks and Rice Fruit Pop Corn	Ham, Cheese, Carrot, Lettuce Roll Fruit <u>Boiled Egg</u> /Carrot Sticks	Honey Soy Chicken and Rice Fruit Cheese and Crackers	Chicken Schnitzel, Cheese and Lettuce and Mayo Rolls Fruit Messy Monkeys

Note: Within the early-2024 menu, there is no mention of meat pies or BBQ meatball rolls (with no vegetable content). Further to this, Milo Bars, Shapes and banana bread, although not stated here, are still offered regularly. While stated menu items such as Messy Monkeys, popcorn, lite cheese and crackers were not offered in the documented periods.

## **Impact on Food Security**

Anecdotal and photographic evidence of the SNP in Alice Springs demonstrates that it does not consistently facilitate food security for its recipients, who are amongst the most vulnerable to food insecurity in remote locations. Despite having clear guidelines, it is non-compliant and largely unregulated by NIAA, the funding body. Continued attempts have been made by local dietitians to advocate for routine review and dietetic input at no cost, into the nutritional adequacy of the SNP but this has been declined by both the ARRCs SNP Manager and the local NIAA Director.

After persistent advocacy by local dietitians, a revised and compliant SNP menu was prepared at the beginning of 2024, photograph evidence shows that there is minimal adherence to this modified menu.

Although some improvements have been made, the revised SNP offerings still do not comply with the guidelines and, subsequently, still does not facilitate food security for its recipients.

## **Relation to Discussion Paper**

The role and intended outcomes of the SNP fall within multiple of the eight key focus areas identified by Strategy Partners as impacting the remote food system (NIAA, 2024), including:

### *Health*

The SNP is delivered by a health sub-branch of ARRCs, as a resource for supporting young children directly and their parents indirectly, to provide suitable nutrition to their children. There is a crucial capacity for ARRCs to work with other services, such as urban dietetic services, to ensure SNP recipients are receiving nutritious and appropriate food for their health needs.

### *Families and Communities*

The food received through the SNP may be the only consistent nutrition a recipient receives, therefore it's vital that it is nutrient-dense and models healthy food options. As such, ARRCs delivery of the SNP must ensure foods received are healthy and appropriate for recipients, to ensure First Nations children are receiving nutrition that has critical benefit their health and wellbeing.

### *Jobs, Partnerships and Affordability (Healthy Economies)*

Although the ARRCs-delivered SNP is an established service, scope to include a flexible training and job program for First Nations people could be explored. This may involve reviewing the possibility of integrating the SNP into CDU's Culinary Arts and Hospitality courses, with the prospect of increasing engagement of First Nations students in its delivery.

### *The Way Government Works (Policies, Practice & Governance)*

Supportive partnerships between ARRCs and health services, such as dietitians, can be mandated to offer education and training on SNP guidelines and meeting nutrition targets. Additionally, establishing routine menu reviews and assessment of meals and snacks delivered through the SNP may ensure compliance, enable support in overcoming barriers that may arise in program delivery and, ultimately, maximise the nutritional adequacy of the SNP. As the intended outcome of the SNP is to improve school attendance and learning outcomes, this may help meet Targets Five, Six and Seven of the Closing the Gap Targets (Closing The Gap in Partnership, 2020).

## Recommendations

1. Compliance to the NT Department of Education's *School & Healthy Eating Policy & Guideline*, including supporting documents such as the Recipe Checklist\* located via [School nutrition and healthy eating | Department of Education](#).
2. A bi-yearly independent review of the nutritional adequacy of the SNP by local dietetic services, with mandated engagement from the SNP Provider, to support the provision of nutritious meals and snacks with understanding of the remote context.
3. Adherence to timely feedback processes between SNP Provider and local schools, with emphasis on prioritisation of nutritional adequacy over proposed changes due to fussy eating or food neophobia.

\*Proposed Improvements for Main Meals (adapted from Recipe Checklist):

- contains plenty of vegetables – these can be fresh, frozen or canned
- uses lean meat such as lean red meat with visible fat trimmed, premium mince, chicken with no skin, leg ham, fish such as tuna and salmon or a meat alternative such as egg, tofu, lentils, legumes and beans
- uses a sauce, gravy or stock that is low in saturated fat and salt
- contains healthy carbohydrates such as pasta, rice, couscous or wholegrain bread
- uses small amounts of monounsaturated or poly unsaturated oil in cooking, for example olive or canola oil and margarine
- contains a reduced fat dairy product such as low or reduced fat milk or cheese:
  - ricotta and cottage cheese are low in fat and great to use in cooking
  - white sauce can be made with low or reduced fat milk and monounsaturated or polyunsaturated oils.

## References

- Closing The Gap in Partnership. (2020). *National Agreement on Closing The Gap*.  
[National Agreement on Closing the Gap](#)
- Department of Education. (2023). *School Nutrition and Healthy Eating – Guidelines*.  
[School nutrition and healthy eating – guidelines \(nt.gov.au\)](#)
- Department of Health. (2014). *National Guidelines for healthy foods and drinks supplied in school canteens*.  
[National Healthy School Canteens - Guidelines for healthy foods and drinks supplied in school canteens](#)
- Department of Health. (2019). *Modified Monash Model*.  
[modified-monash-model-fact-sheet.pdf \(health.gov.au\)](#)
- National Indigenous Australians Agency. (2024). *National Strategy for Food Security in Remote First Nations Communities – Discussion Paper*.  
[Discussion Paper - National Strategy for Food Security in Remote First Nations Communities \(niaa.gov.au\)](#)
- Services Australia. (2023). *School Meals Program*.  
[Use Income Management and BasicsCard for the School Meals Program in the Northern Territory - Income Management and BasicsCard in the Northern Territory - Services Australia](#)