

15 September 2025

Productivity Commission
Level 8, Two Melbourne Quarter
697 Collins Street
Docklands Vic 3008

Dear Commissioners

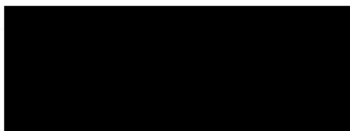
Thank you for the opportunity to provide feedback on the Productivity Commission's Interim Report *Delivering quality care more efficiently*. Food for Health Alliance is a partnership between Cancer Council Victoria, The Global Centre for Preventive Health and Nutrition at Deakin University, Healthway and VicHealth. We are a leading policy and advocacy voice working to improve diets and prevent overweight and obesity in Australia. We advocate to governments across Australia for changes to laws and policies to improve our food environment.

Food for Health Alliance's comments are focused principally on the National Prevention Investment Framework. Our engagement in this work is focused on how the Framework and other changes to assessing value in the health and prevention space can be applied to programs and policies that can change our food environments, improve diets and prevent overweight and obesity.

We support the submission provided by our partner organisation, VicHealth, and make the following comments:

- We support draft recommendation 3.1 to establish a National Prevention Investment Framework to support investment in prevention, improving outcomes and slowing the escalating growth in government care expenditure. Food for Health Alliance has a long history of supporting increased investment in prevention in Australia, in particular the commitment set out in the National Preventive Health Strategy to increase preventive health funding to 5% of the annual health budget by 2030. To support this, it is important that an appropriate framework to prioritise and distribute funding is developed. We support a focus on primary prevention and on interventions that can address broader determinants of health, including social and commercial determinants.
- We understand the proposed Framework to be focused on providing a structure to guide program funding decisions. While this is important, to achieve greater change, the scope of a focus on prevention must extend beyond programs to policy and regulatory change, as we know these will have the most significant impact on population health and promote equity. Budgetary and decision-making processes that assess policy and regulatory change must be reoriented to have prevention, long-term health outcomes and wellbeing as key inputs. Current processes do not effectively capture long-term public health outcomes, either from a population health or economic perspective.

Yours sincerely



Jane Martin BA MPH Hon Doc
Executive Manager