Influencing Commercial Determinants of Health

A resource for Victorian local government

VicHealth

Acknowledgements

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VicHealth health promotion modules for local government

The [VicHealth Local Government Partnership](#) (VLGP) aims to support local governments to improve the health and wellbeing of children, young people and their families. To do this, VicHealth has partnered with sector experts to develop a suite of health promotion modules that provide how-to guides and recommend resources for health promotion action.

The Influencing Commercial Determinants of Health module supplement has been developed to introduce local government to the emerging area of Commercial Determinants of Health (CDoH) and demonstrate how the systems, products and practices commercial businesses choose to adopt can impact the health and wellbeing of communities.

This module also outlines a three phased approach for local governments on how they can take action in a range of portfolio areas using council specific levers, to address the influences of commercial organisations on the health and wellbeing of communities.

This module supplement outlines:

- An introduction to the CDoH

- The unique levers and opportunities for local government to influence CDoH

- Examples of innovative practice led by local governments

- A range of resources for local government.
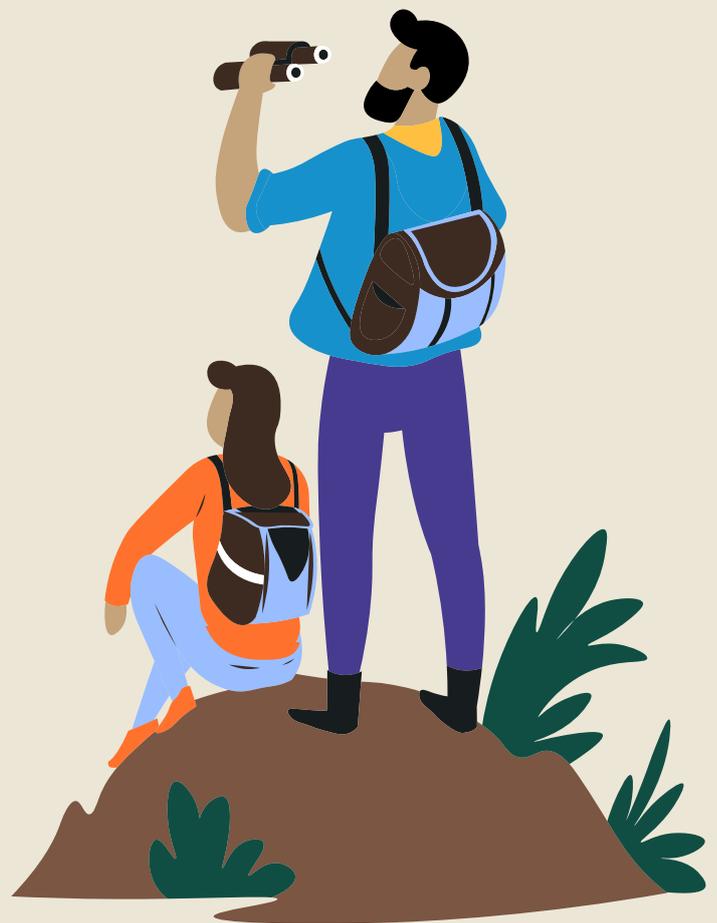
Disclaimer

This module supplement is designed to support local government by providing a range of action examples, recognising that local governments vary widely in the size and needs of their municipalities, and the staff, resources and political will they have to implement actions. While some of the action examples are straightforward, some are more ambitious and complex, and would need support from executive staff, council leadership, and the community.

Introduction and context – people, profits and health

Many of us are working to build a world in which the health and wellbeing of people and the planet are higher priorities than profit, and where commercial organisations contribute positively to health and wellbeing instead of causing harm.

Local governments are leaders in creating environments and delivering services that support the health and wellbeing of communities. However, the products and practices of some commercial organisations, and the systems they operate in, harm the health of our communities and the planet, undermining the work of governments. Addressing these systems, practices and products is essential for preventing poor-health and diseases, such as cancer, heart disease, diabetes and mental health, as well as addressing broader challenges, such as health and social inequities, affordable housing and climate change.[1]

The impacts that commercial organisations have on the health of our communities and the planet can be addressed at all levels of government.

What are the commercial determinants of health?

Commercial determinants of health are the ways commercial organisations influence health and wellbeing, and health equity in communities.[2]

Commercial organisations range from small, locally owned businesses to major corporations and financial institutions. The choices commercial organisations make about the products they sell and how they operate influences people's health and wellbeing in varied and complex ways.

When commercial organisations undertake practices that provide equal access to healthy food, quality healthcare, affordable housing, and safe and fair working conditions, they play a crucial role in strengthening communities.

However, the practices and products of some commercial organisations are responsible for escalating levels of preventable ill health, social and health inequity and environmental damage. Alarmingly, industries that produce just four harmful products – tobacco, alcohol, unhealthy food and fossil fuels – cause a third of preventable deaths globally each year.[1]

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2. Gilmore AB, Fabbri A, Baum F, Bertscher A, Bondy K, Chang HJ, Demaio S, Erzse A, Freudenberg N, Friel S, Hofman KJ, Johns P, Abdool Karim S, Lacy-Nichols J, de Carvalho CMP, Marten R, McKee M, Petticrew M, Robertson L, Tangcharoensathien V, Thow AM. Defining and conceptualising the commercial determinants of health. Lancet. 2023 Apr 8;401(10383):1194-1213. doi: 10.1016/S0140-6736(23)00013-2. Epub 2023 Mar 23. PMID: 36966782.

Key practices of commercial organisations that harm health

The [Lancet series on Commercial Determinants of Health](#) identified **seven key practices** that commercial organisations use to advance their interests rather than community interests – allowing them to grow their profits, wealth and power, and contribute to poor health and inequity in communities.

1. **Political practices:** that influence government policies to advance commercial organisations' interests, such as political donations and lobbying. For example, political donations by the gas industry in WA were shown to correspond to political decisions affecting these donors.[3]

2. **Science practices:** that influence scientific processes to produce results favourable to commercial organisations, such as funding research and influencing research agendas. For example, the tobacco industry has funded research into its own products, typically only releasing it when results are favourable to them.[4]

3. **Marketing practices:** that increase sales and consumption of harmful products, including placement of stores selling harmful products, advertising, sponsorship and targeted digital marketing. For example, research has found that some commercial organisations use Australian children's personal data to target them with digital marketing for alcohol, unhealthy food and gambling.[5]

4. **Supply chain and waste practices:** that have negative impacts on people's health and the environment, usually designed to save costs. For example, about 2.4 million tonnes of food is wasted in Victoria each year, including by food businesses and along the food industry supply chain. This contributes about 15% of Victoria's non-energy greenhouse gas emissions and wastes around 29 billion litres of water.[6]

5. **Labour and employment practices:** that force people to work in unsafe, low-paid and insecure conditions in commercial organisations and their supply chains, designed to minimise costs.

For example, workers in Victorian and Australian abattoirs and meat-processing facilities work in high-risk conditions, with many on casual contracts with no access to sick leave.[7]

6. **Financial practices:** designed to avoid or evade taxes or limit competition in markets, reducing the money people and governments have available to spend on goods and services necessary for health, such as healthcare. According to the Australian Tax Office's most recent [Corporate tax transparency report for 2020–2021](#), almost a third of large Australian companies, and more than half of the mining, energy and water companies included in the report, paid no income tax in 2020–2021.[8]

7. **Reputation management practices:** designed to improve legitimacy, credibility and the brand image of commercial organisations. For example, the Australian Petroleum Production and Exploration Association claimed that gas was "50% cleaner than coal" in its 2023 "Future of Gas" public relations campaign, before revoking the statement after the advertising regulator ruled the claim was "misleading".[9]

Resources:

- [The Lancet series on Commercial Determinants of Health](#)

- [World Health Organization fact sheet on Commercial Determinants of Health](#)

3. 350 Boorloo Perth (2020). Captured State: the influence of the oil & gas lobby in WA. 350.org Australia. Available from: https://350.org.au/captured-state-the-influence-of-the-oil-gas-lobby-in-wa-2/

4. Freeman B, Vittiglia A, and Winstanley M 2018. 10A.3 Mechanisms of influence – industry funded research. In Scollo MM, and Winstanley MH [editors]. Tobacco in Australia: Facts and Issues. Melbourne: Cancer Council Victoria. Available from: http://www.tobaccoinaustralia.org.au/chapter-10-tobacco-industry/10a-3-the-mechanisms-of-influence-industry-funded-

5. VicHealth 2020, Under the radar: Harmful industries' digital marketing to Australian children. A report prepared by the Victorian Health Promotion Foundation, Melbourne. https://doi.org/10.37309/2020.CI910

6. Sustainability Victoria 2020. The Path to Half: Solutions to Halve Victoria's Food Waste by 2030. Sustainability Victoria. Available from https://assets.sustainability.vic.gov.au/asset-download/Report-The-Path-to-Half.pdf

7. Moolchand E, Marshall S 2022. 'Where's the meat? Employers and governments should have seen this supply crisis coming and done something. The Conversation, 24 January 2022. Available from: https://theconversation.com/wheres-the-meat-employers-and-governments-should-have-seen-this-supply-crisis-coming-and-done-something-175144.

8. Australian Tax Office 2023. Corporate Tax Transparency Report 2021-2022. Australian Tax Office, Australian Government. Available from: https://www.ato.gov.au/businesses-and-organisations/corporate-tax-measures-and-assurance/large-business/in-detail/tax-transparency/corporate-tax-transparency-report-2021-22/about-this-report.

9. Readfern G 2023. 'Consumer watchdog urged to investigate 'misleading' Australian oil and gas industry PR campaign.' The Guardian, 21 July 2023. Available from: https://www.theguardian.com/environment/2023/jul/21/consumer-watchdog-urged-to-investigate-misleading-australian-oil-and-gas-industry-pr-campaign,

What role can local government play in influencing CDoH?

Local governments are focused on good governance for the wellbeing of their municipalities. They already play a significant role in preventing and reducing the impacts of harmful industries on their communities, such as tobacco, vaping, gambling, alcohol and fossil fuels. This includes through local laws, planning, policies, advocacy, services and programs.

Many are already doing significant work to hold commercial organisations to account, and making changes to promote commercial practices and economic activities that improve health, equity and sustainability.

For example, some councils are developing strategies to encourage sustainability, reduce waste and support a circular economy,[10] and to promote a local supply of sustainable and healthy food. They are also investigating ways to encourage developers to include affordable housing as part of new developments and are engaged in future planning and actions to mitigate the risks and impacts of climate change.

Importantly, local governments play a crucial role in providing high quality, accessible public services, facilities and programs to the community, including childcare, kindergartens, maternal and child health, sports and recreation facilities, and community, arts and cultural centres and events. This ensures all community members have fair and equitable access to these services, helping to reduce unfairness and inequities that can be created by privatisation of essential services.

Through leveraging their unique role and function, there are many opportunities for local governments to address harmful commercial influences on the wellbeing of their community.

This module supplement outlines a three phased approach to help local governments determine where to start and what type of action they should take first:

Phase 1: Foundational actions

1. Research and data, and building internal awareness
2. Community awareness, promotion and capacity building

Phase 2: Early action opportunities

3. Investment and divestment
4. Procurement
5. Council-owned or -managed property
6. Healthy partnerships, sponsorships and grants

Phase 3: Longer term action

7. Local laws and enforcement
8. Planning
9. State and federal advocacy
10. Alternative economic models

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10. The circular economy involves sharing, leasing, reusing, repairing, refurbishing and recycling existing materials and products as long as possible to extend their life cycle and keep waste to a minimum

Phase 1:
Foundational actions

The areas and actions in this phase are considered foundational for building the authorising environment for change, both within council and with community, as well as creating readiness through identifying local partnerships and opportunities for action.

Through addressing the below areas and actions you will build the evidence base, understand the need and perceptions of your community, build awareness and understanding within council and in the community, and create new and leverage existing partnerships to align efforts. Through undertaking local mapping and identifying opportunities within your local government area, you will be well placed and ready to take further action.

1. Research and data, and building internal awareness

Research and data

A fundamental starting point for considering approaches and actions to address CDoH is gathering evidence, research and local data to demonstrate to council leadership and cross-council departments the need for investment to address CDoH, as well as to inform priorities and actions. Local governments collect health and wellbeing data to inform their Municipal Public Health and Wellbeing Plan (MPHWP), as well as data on community views through their annual community perceptions survey. There are also many existing research and data sources that can be drawn on (see Resources section).

Relevant research and data may include:

- Local demographic and health and wellbeing data, including rates of chronic disease.

- Data on the local impacts of industries selling or promoting harmful products, such as rates of tobacco, vaping, alcohol and gambling use and harms.

- Mapping of the types of commercial organisations operating in the municipality, the nature of their goods, services and operations, and to what extent they have negative or positive influences on community health and wellbeing.

- Community views and experiences of the influences of commercial organisations on health and wellbeing, and support for local government actions to address CDoH.

Action examples:

Collect community perceptions data on CDoH
Collect data on community views in relation to CDoH. Consider adding questions to Council's annual community perceptions survey, such as views about the influence of commercial organisations on health, and support for local government actions to address these influences.

Develop a local CDoH profile
Develop a brief local overview of CDoH, summarising evidence and local data.

Embed consultation on CDoH within MPHWP planning process
Undertake consultation with community members, including parents and principal and health networks, embedding in the MPHWP consultation process to hear what they think.

Building internal awareness

Raising awareness internally, with executives and elected representatives and across other business units, is important to progress CDoH actions. Through communicating local evidence of the harmful impacts on children, young people and families as well as highlighting community support for action in these areas, council stakeholders and leaders are better informed and able to consider committing funding and resources. This requires gathering local data and evidence, finding case studies and examples of best practice by other local governments, and developing a compelling case for action.

Identifying local partners (e.g. community health, Local Public Health Unit etc.) and community leaders with shared values and commitment to addressing CDoH, that can support activities outlined below, and highlighting community support for actions, will strengthen your internal efforts.

Action examples:

Gather relevant data and evidence

Identify council plans and policies that align with actions to address CDoH, and local government case studies and examples of best practice.

Develop an internal communications strategy on CDoH

Develop an internal communications strategy with the aims of educating staff and council leaders on what CDoH means, how it is relevant to local government, and how addressing CDoH will help meet the Council Plan, MPHWP and other policy objectives.

Develop an internal CDoH briefing document

Develop an internal briefing document highlighting evidence and community support for actions, and key case studies of successful initiatives by other local governments.

Develop a short 'elevator pitch'

Develop an 'elevator pitch' for the CDoH action you are seeking to implement, with short key messages defining the problem, why it matters, the solution and benefits. Values-based messaging can support you to structure your communications in a way that has the most impact.

Include content on CDoH in the onboarding program

Include content on CDoH in the onboarding program for new councillors and staff members. This could include presentations, videos, or interactive sessions to introduce councillors to the key concepts and challenges.

Case Study

Hume City Council gambling research

Hume City Council collaborated with Deakin University to explore the influence of gambling marketing on young adults and the dynamics of gambling sponsorship in local sports. These research projects directly shaped the Council's Gambling Harm Minimisation Policy.

In 2023, Hume City Council also surveyed the community to learn more about their thoughts, feelings and lived experiences with gambling harm, and developed a video and infographic on the findings. The survey findings will help inform the Council's policy and advocacy, including its response when the Victorian Government considers applications to increase or transfer Electronic Gambling Machines (EGMs) within Hume. Survey findings will also inform the Council's 2024 review of the Gambling Harm Minimisation Policy.

Resources

Demographic and health data
- Victorian public health and wellbeing outcomes dashboard
- VicHealth Coronavirus Victorian Wellbeing Impact Study and follow up survey
- Victorian Aboriginal Affairs Framework (VAAF) data dashboard

Harmful industry data
- Obesity evidence hub
- Turning Point AOD Stats
- Alliance for Gambling Reform gambling data

Housing data
- ABS Census homelessness data
- Council to Homeless Persons data
- AIHW housing data
- Inside Airbnb

Sustainability and transport data
- Recycling Victoria data hub
- Sustainability Victoria research, data and insights
- Bicycle network transport surveys and data

Climate change data
- Climate Council climate risk map
- Climate Council's 'Councils on the Frontline' report

Community satisfaction data
- Local Government Community Satisfaction Survey 2023

2. Community awareness, promotion and capacity building

Awareness and promotion of commercial influences on health

Local governments can play an important role in building community awareness of commercial organisations' influence on health and wellbeing.

This may involve building community understanding of broader commercial influences on health, encouraging people to consider these influences when making purchase decisions, and influencing commercial organisations to shift to healthier and fairer practices. Community awareness campaigns may have additional benefits including building community and political support for policy change to address CDoH.

Promoting healthy business

Local governments can showcase and promote local businesses that have positive impacts, recognising them with awards and running campaigns to encourage community members to shop locally.

Capacity building for healthy businesses

Local governments can build capacity of local businesses in various ways. For existing businesses, council can provide CDoH education, such as guidance, tools and resources, that demonstrate how they can improve their products or practices for community wellbeing.

Education and capacity building topics for local businesses could include:

- Improving the healthiness of food products and menus

- Reducing waste, improving sustainability, and reducing carbon emissions of business and supply chains

- Ensuring fair and safe working conditions in supply chains

- Procurement and purchasing decisions, including using local suppliers with positive wellbeing impacts

- Choosing ethical investments (including banks and super funds) and divesting from harmful industries.

Action examples:

Awareness and promotion of commercial influences on health

- **Run a harmful industry community awareness campaign**
  Develop and run local campaigns to expose and raise awareness of harmful tactics of industries such as gambling, tobacco, alcohol, unhealthy food or fossil fuels.

Promoting healthy businesses

- **Develop a healthy local businesses awards program**

  Develop or expand an existing awards program to recognise local businesses with positive community health and wellbeing influences. Develop different award categories, such as: healthy eating; healthy local food system; inclusive employment and training; fair and safe supply chains; social connection and inclusion; environmental sustainability; and circular economy. This is an opportunity to showcase and promote award-winning businesses to the community and encourage businesses to strive to improve their practices and community impact.

- **Run a healthy local businesses community campaign**

  Run a community campaign to showcase and promote local businesses with positive health and wellbeing impacts, encouraging community members to shop locally and support these businesses.

  Many local governments already run 'buy local' campaigns. Consider opportunities to shift the focus of these campaigns to highlight businesses with positive community impacts and avoid promoting those with harmful influences. Provide incentives to community members for shopping locally and supporting healthy and sustainable local businesses, such as vouchers or prizes.

- **Develop a healthy local business map or directory**

  Consider developing a local map or directory focused on showcasing local businesses, products and services with positive health, wellbeing or sustainability impacts. See for example, the Geelong Sustainability Directory and Sustainability Victoria's Buy Recycled Directory.

Capacity building for healthy businesses

- **Develop and publish capacity building resources for local businesses**

  Develop and publish guidance or tools (e.g. guides, websites, videos or podcasts) to help build the capacity of local businesses to promote community health and wellbeing. See for example, the City of Melbourne Sustainable Business Guide, which provides tips, tools and capacity-building resources to support local governments to improve sustainability across a range of areas, including energy efficiency, water management, product purchasing, food and drink packaging, waste management and travel.

- **Launch a healthy business incubation program**

  Provide tailored start-up support and coaching to foster new businesses with positive influences on community health and wellbeing.

- **Boost healthy business trading opportunities**

  Provide and promote trading opportunities for local businesses that contribute to community health and wellbeing, such as local markets and festivals.

Case Study

City of Kingston's Sustainable Business Awards

The City of Kingston's inaugural 2023 Sustainable Business Awards spotlighted the positive community impacts of local businesses. With six categories including Waste Reduction and Circular Economy, Ethical Sourcing and Procurement, Diversity and Inclusion and Sustainable Leadership, businesses were recognised for sustainable and ethical leadership, innovation, and positive change in Kingston. The awards aimed to foster networking, information-sharing, and integrate sustainable practices into business operations.

Resources

- [Vic Kids Eat Well awards](#)

- Vic Kids Eat Well [Put the 'Fun' into Fundraising in Council and Community Facilities: Get Creative with Healthy Fundraising](#)

Phase 2:
Early areas for action

Phase 2 supports and enables councils and partners to act on opportunities identified through Phase 1 and explore early areas for action.

The areas and actions in this phase relate to the systems and practices of local government. Decision making regarding these practices is predominantly the responsibility of council and/or elected representatives, and therefore within councils' sphere of influence to enact change. Changes in these areas can be undertaken within shorter timeframes and are less of a cost burden to council.

Successfully addressing the below areas and actions will rely on strong cross-council collaboration and partnerships established through Phase 1. These collaborations will enable you to build internal advocates for the action as well as understand what the levers are and what process you need to follow.

3. Investment and divestment

Through investment and divestment, local governments can leverage their financial power to influence financial institutions to shift towards investments that contribute to a healthier and more sustainable future for their communities.

Local governments' investment activities are regulated by the *Local Government Act 1989*. They cannot have direct investments (i.e. in shares). However, local governments can invest in "approved deposit-taking institutions" (i.e. banks and financial institutions).

As major customers for banks, local governments can choose to divest from banks that fund harmful industries, and to only invest in, or use the services of, banks and financial institutions that have ethical funding practices that align with community values and health and wellbeing objectives.

By divesting, local governments send a market-based signal to financial institutions and the wider community about the social cost of investing in harmful industries. This drives demand for ethical investment options and influences financial institutions to reshape their funding practices.

Action examples:

- **Review Council's investments**
  Review Council's investments, financial services arrangements and loans. Use websites, such as the Market Forces and Responsible Returns websites, to identify whether any investments or arrangements are with financial institutions that invest in harmful industries.

- **Consider opportunities to strengthen divestment policy**
  Review Council's current investment/divestment policy and explore opportunities to strengthen or broaden it to include strategies, actions and timelines to shift Council's investments to financial institutions not aligned with harmful industries that invest in health, wellbeing and sustainability.

- **Develop a framework to monitor investments**
  Develop a framework to maintain ongoing reporting and review of Council's banking and investments and ensure compliance with investment and divestment policies as financial institutions change their investments and funding practices.

Merri-bek Council fossil fuel divestment

In 2014, Merri-bek Council became the first Victorian local council to commit to divestment from fossil fuel aligned financial institutions. In response to community concerns about the impacts of the fossil fuel industry on climate change, the Council commissioned a fossil fuel divestment options report, and developed a Fossil Fuel Divestment Strategy. Under this comprehensive Strategy, the Council committed to increase its engagements with banks and financial institutions with fossil fuel-free investments, and to seek to influence large banks' investment practices.

City of Melbourne's divestment from fossil fuels and tobacco

In 2015, the City of Melbourne decided to divest from fossil fuel aligned financial institutions, calling upon their default superannuation fund to create a fossil fuel free investment option, and considering fossil fuel exposure when awarding their transactional banking contract. In 2017, the City of Melbourne also became the first local government in Australia to make a commitment to divest from financial institutions that fund the tobacco industry.

Resources

- 350.org Australia's 'Aligning Council Money with Council Values' guide

- Investor Group on Climate Change website

- Don't Bank on the Bomb website (shows financial intuitions investing in nuclear weapons)

- Tobacco Free Portfolios website (shows financial institutions that are signatories to the Tobacco-Free Finance Pledge)

- Australian Conservation Foundation report, Risky business: How Australia's banks and super funds are responding to the nature crisis

- Western Australian Local Government Association Divestment in Fossil Fuels paper

4. Procurement

Procurement of goods and services is a key aspect of local governments' activities. Increasingly, local governments across Victoria are adopting social and sustainable procurement policies, using their buying power to create social and environmental benefits for communities.

- 'Social procurement' means purchasing goods and services that have social value over and above the value of the goods or services being procured.

- 'Sustainable procurement' means purchasing goods and services that have the most positive environmental, social and economic impacts over their entire lifecycle.

There may be opportunity for local governments to strengthen and broaden their procurement policies to improve community wellbeing. For example, procurement policies may promote:

- Avoiding procurement from harmful industries, or commercial organisations with harmful industry partnerships or alignments.

- Healthy and sustainable food procurement that supports health and wellbeing, local circular food systems, and sustain able waste management.

- Procuring goods and services from social enterprises, Aboriginal and Torres Strait Islander businesses, Australian Disability Enterprises, and other priority groups.

- Procuring goods and services from commercial organisations that ensure fair and ethical trade and working conditions throughout their supply chains, or that provide inclusive local employment opportunities.

- Procurement for local government building and infrastructure projects that embeds circular economy and environmentally sustainable design principles.

- Council fleet procurement that meets greenhouse gas emissions requirements and supports the uptake of electric vehicles.

Action examples:

- **Identify opportunities to strengthen and broaden Council's procurement policy**

  Review Council's procurement policy and processes. Consider opportunities to incorporate a broader range of health, wellbeing and sustainability considerations, and increase the transparency of Council's processes.

  Consider Council's procurement needs and to what extent these could be met by commercial organisations with positive community benefits, such as social enterprises.

  Identify whether Council procures goods and services from harmful industries or aligned commercial organisations, and strategies to shift to alternative suppliers.

  Consider developing a framework or matrix for guiding Council's procurement decisions based on social, environmental, health, wellbeing and economic criteria.

- **Develop a directory of local healthy suppliers**

  Develop a directory of local suppliers, including social enterprises, that have positive community health and wellbeing impacts, which can be referred to when making procurement decisions. For example, a group of local governments in inner city and south-east Melbourne have produced a directory of local social enterprises for procurement.

- **Consider partnership opportunities to increase buying power and community benefits**

  For example, see the Renewable energy partnership case study (below) and the Melbourne Renewable Energy Project.

Renewable energy partnership

In 2021, 46 Victorian councils formed a ground-breaking partnership with Red Energy to pool their electricity needs into one long-term contract. The partnership will provide the 46 municipalities with 240GWh of 100% renewable energy until 2030, generated from two wind farms in regional Victoria.

It was estimated that the partnership would reduce greenhouse emissions by 260,000 tonnes of CO_2 every year.

Melton City Council social procurement

In a recent procurement for open space services, Melton City Council included a 10% target for suppliers to offer employment to local people experiencing unemployment in the tender requirements. In response, Citywide partnered with the Brotherhood of St Laurence, leading to a successful bid response.

The Brotherhood of St Laurence played a pivotal role in the bid, offering personnel identification, pre-employment training, and ongoing mentoring, along with support for employers in integrating new staff. A year later, the workforce includes over 10% of employees (9 out of 70) who were previously unemployed, demonstrating the success of this collaboration in achieving significant social impact.

Resources

- Local Government Victoria Guide to Social Procurement and toolkit for local councils

- MAV Procurement guidance and resources

- Victorian Government Social Procurement Framework

- City of Melbourne Sustainable Procurement Framework

- VicHealth Harmful Industry Relationship Funding and Procurement Policy

- Sustainability Victoria's Procurement Toolkit and Buy Recycled Service for local government

- Kinaway Chamber of Commerce Victoria's Business Directory

- Supply Nation – Australia's largest national directory of Indigenous businesses

- Social Traders' Social Enterprise Finder

- Healthy Eating Advisory Service Catering for Good Directory

5. Council-owned or managed property

Local governments own and manage a large amount of property, including land, venues and facilities, on behalf of their communities. This provides opportunities to ensure the property is used to benefit community health and wellbeing.

Leases and licences of council-owned property

Much of local governments' property is leased or licensed to commercial organisations, not-for-profit and community organisations, and sports and other clubs. Local governments can decide to prioritise healthy organisations or create incentives under their lease agreements for organisations to provide community health and wellbeing benefits.

They can also ensure council property is not leased or licensed to organisations with harmful commercial influences or alignments and include requirements in their lease agreements to prohibit or restrict the supply and promotion of unhealthy products on their property, including tobacco, alcohol, EGMs and unhealthy food. In addition, they can prevent hirers from receiving sponsorships or funding from harmful industries. For example, Darebin's Electronic Gaming Policy 2023-2027 prevents community clubs, organisations or businesses that lease or hire council-owned facilities or buildings from receiving sponsorship or grants from EGM operators.

Advertising on council-owned property

Local governments can develop policies and standards to prevent advertising and promotion of unhealthy or harmful products, venues and brands on council property, assets and facilities. For example, the City of Yarra has a policy of not allowing advertising of tobacco, alcohol, gambling or fossil fuels on its property.

Developments on council-owned land

Council-owned land is sometimes leased or sold to developers for private developments. Local governments can influence these developments to ensure they support community health, wellbeing and sustainability through mechanisms like incentives or requirements in lease agreements. For example, lease agreements can ensure private developments on council-owned land:

- Include a minimum amount of quality affordable housing
- Use sustainable and energy efficient materials, construction, lighting, heating and cooling
- Incorporate green spaces and community gardens
- Support electric vehicle uptake
- Meet renewable energy benchmarks.

Action examples:

Leasing and licensing council property

- **Strengthen lease and licence policies**
  Review Council's policy on leasing and licensing property. Consider whether lease and licence criteria, requirements and incentives could be strengthened or expanded to shift commercial organisations towards more positive health and wellbeing influences.

- **Develop an incentives framework**
  Develop an incentives framework to encourage clubs and organisations to shift to healthier products and practices to be eligible for rent reductions or licence fee subsidies, such as by improving the healthiness of their retail food menus or restricting the sale and promotion of alcohol. Incentives could be based on a sliding scale or tied to health and wellbeing standards achieved.

- **Work towards divestment from EGMs**
  Prevent EGMs under all new lease applications and agreements of council-owned property. Develop a policy and action plan to support sports clubs and organisations already leasing council property to divest from EGMs, including setting timelines for removing EGMs when lease agreements come up for renewal, and supporting clubs to find alternative revenue sources.

Advertising and sponsorship on council property

- **Update advertising and sponsorship policies**
  Investigate opportunities to update or develop a new policy on advertising and sponsorship on council-owned property to prevent harmful industry advertising, promotion, sponsorship or branding (including on sports uniforms and equipment).

- **Develop a healthy fundraising and sponsorship guide and directory**
  Help organisations and clubs identify alternative sponsors and revenue sources to move away from harmful industry sponsorship, fundraising and sports awards/vouchers by developing a guide on healthy sources of fundraising and sponsorship, and/or a directory of healthy local sponsors.

A healthy fundraising and sponsorship guide could be a way to promote and showcase local businesses. It could also include guidance for council staff in seeking sponsorship for council events and activities. See further in 'Healthy partnerships, sponsorships and grants' section below.

Private developments on council-owned land

- **Investigate opportunities to influence developments on council-owned land**
  Review Council's housing policy and strategy. Identify whether council-owned land is leased or sold to private property developers for housing or other developments. Investigate opportunities to require or encourage new developments to promote health and wellbeing (such as through requirements under lease agreements and incentives).

Case Studies

The Active Monash Sports Club Framework

Developed by the City of Monash, the Active Monash Sports Club Framework strategically uses lease agreements of council-owned property to incentivise sports clubs to improve their influences on community health and wellbeing.

The framework establishes Mandatory, Bronze, Silver, Gold, or Platinum standards for sports clubs across different priority areas, with sliding scales of incentives according to the standard attained. The "Healthy and Resilient" priority area includes standards for the supply of alcohol, and healthy food and drinks. The Silver standard requires no promotion of alcohol and providing healthier food and drink offerings; the Gold standard requires no alcohol supply during junior matches or training (or one hour after) and a healthy eating plan or system; and the Platinum standard requires no alcohol supply and healthy eating options only.

Clubs that meet the standards get benefits such as fee subsidies, priority access, favourable consideration for upgrades, and participation in exclusive programs. Non-compliance may result in lower priority for facility access during high-demand periods.

Hobson's Bay City Council – removing EGMs and gambling advertising on council-owned property

Hobson's Bay City Council is addressing gambling through its Gambling Harm Prevention Policy, focusing on council assets to tackle EGMs and online gambling impacts. Priority Area Three of the Policy is to divest from EGMs on council-owned property. Actions involve avoiding EGM increases during lease renewals, not leasing property to EGM-operating organisations, and working to eliminate gambling venue advertising on council-owned land.

Resources

- [Ballarat Community Health Healthy Fundraising Guide](#)
- [Darebin's Electronic Gaming Policy 2023-2027](#)
- [Monash Public Health Approach to Gambling Policy](#)
- [Healthy Eating Advisory Service](#)
- Community Housing Institute Association Victoria and MAV, [Options for Delivering and Securing Affordable Housing on Local Government Land: A Guide for Councils and Registered Housing Agencies guide](#)
- Community Housing Institute Association Victoria and MAV, [Using Council Land for Affordable Housing fact sheet](#)
- [Sustain Healthier Food Advertising Policy Toolkit](#)

6. Healthy partnerships, sponsorships and grants

Local governments can develop healthy and productive partnerships with commercial organisations to foster positive commercial influences on health and wellbeing. This may involve partnering with or awarding grants to social enterprises, local healthy food producers, local sport and recreation suppliers, and other businesses or enterprises contributing to the wellbeing of the community. It may also involve negotiating with commercial organisations to secure benefits for their communities. For example, local governments have been leaders in bargaining with energy companies to facilitate lower cost renewable energy for their communities.[11]

However, partnerships, sponsorships, donations or alignments with commercial organisations with negative influences on health can undermine the work of local governments and the wellbeing of communities. These partnerships may risk compromising local government decision-making, creating perceptions of undue influences, and sending mixed messages to the community by normalising and promoting products and services that are detrimental to health.

Increasingly, local governments are strengthening or developing policies to ensure their partnerships, sponsorships and funding grants are transparent, free from harmful industry alignments and lobbying, and consistent with their health and wellbeing objectives.

Action examples:

Develop a healthy partnerships, grants and donations policy

- Identify harmful industries that Council will not partner with, fund, or accept donations from (e.g. fossil fuels, gambling, tobacco, alcohol).

- Review existing council policies on partnerships, grants, donations, conflicts of interest and commercial engagements. Consider whether Council has existing relationships or alignments with harmful or unhealthy commercial organisations.

- Develop criteria or a framework for determining whether commercial organisations are harmful or unhealthy, or aligned with harmful or unhealthy industries. Develop clear and transparent guidelines for engagement with these commercial organisations.

- Update or develop a new policy, standard or transparent guidelines for funding community organisations and grant applicants based on whether they have third-party partnerships or alignments with harmful industries. For example, the Ballarat Harmful Industries Declaration and Sponsorship Guide.

Develop a healthy sponsorships policy for council events

- Develop a healthy sponsorships policy to guide decision-making about healthy sponsors and funding for council-run or council-funded events.

- Develop a policy to prohibit all harmful industry sponsorship of council events and consider strategies to advocate for such a policy to council leadership. This may involve identifying alternative sponsors and funding sources, presenting evidence of the impacts of harmful sponsors, and describing how this will help Council meet its Council Plan, MPHWP and other policy objectives.

- See the 'Healthy sponsorship policy for council-run events' template in the VicHealth Local Government Partnership Building Better Food Systems for Healthier Communities core module (pages 121-2).

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11. City of Melbourne, Climate Change Mitigation Strategy 2050. Available from: https://www.melbourne.vic.gov.au/sitecollectiondocuments/climate-change-mitigation-strategy-2050.pdf.

Strengthen grants program to foster healthy commercial partnerships

- Review Council's grants program and identify opportunities to develop or strengthen the program to encourage award of grants to organisations or projects that will positively influence CDoH.

- Consider developing criteria or different categories of grants to foster local businesses, partnerships and initiatives, in areas such as:

  - Improving physical and mental wellbeing

  - Supporting local food systems (e.g. local food producers, farmers and grocers, and food businesses that prioritise health and sustainability)

  - Addressing homelessness and creating pathways to housing

  - Creating inclusive employment opportunities and pathways

  - Creating inclusive social connection opportunities and addressing loneliness and isolation

  - Zero waste, recycling, circular economy and sustainability initiatives

  - Supporting local renewable energy projects, and encouraging investment in community energy

- Engage with the local community, community groups, social enterprises and businesses to inform or co-design grants and partnership programs. See for example the City of Melbourne's Social Investment Partnerships Grants program.

- Publicise and raise awareness of grant opportunities for healthy businesses and enterprises.

Crossover opportunity ⤬

See: 'Step-Up Action: Support healthy partnerships through community grants program' and 'Ambitious: Create healthy partnerships through grants – a more comprehensive approach' in the VicHealth Local Government Partnership Building Better Food Systems for Healthier Communities core module (pages 105-107).

See also: 'Step-Up Action: Reduce the consumption and promotion of alcohol products at council-run festivals and events' in the VicHealth Local Government Partnership Increasing Alcohol Harm Prevention at a Local Level stretch module (pages 17-19).

City of Ballarat – Harmful Industries Declaration and Sponsorship Guide

The City of Ballarat developed the Harmful Industries Declaration and Sponsorship Guide to support its decision making on awarding community grants, and to encourage clubs and organisations to be more aware of the impacts of harmful industry alignments and move to healthy sponsors.

The guide requires all grant applicants to declare harmful industry sponsors who pose risks to community health and wellbeing. The declaration supports the grant committee in their decision making on grant allocations by setting out low-, moderate- or high-risk categories for sponsors, considering factors like brand profile, products, and sponsorship practices. The guide also refers grant applicants to resources to support healthy fundraising and sponsorship alternatives.

Resources

- Ballarat Community Health Healthy Fundraising Guide

- Monash Public Health Approach to Gambling Policy

- Climate Council: How to remove fossil fuel sponsorships from sport, arts and events

- VicHealth Harmful Industry Relationship Funding and Procurement Policy

- VicHealth healthy sport sponsorship information

- Healthway WA Co-Supporters Policy and Guidelines

- Vic Kids Eat Well Put the 'Fun' into Fundraising in Council and Community Facilities: Get Creative with Healthy Fundraising

- City of Melbourne's Social Investment Partnerships Grants program

- Climate Council City Power Partnership.

Phase 3:
Longer term action

Phase 3 supports and enables councils and partners to explore and act on opportunities that require longer term joint action and advocacy efforts for change.

The areas and actions in this phase relate to the systems and practices of local governments, however they are heavily influenced by state and federal governments and/or other peak bodies who hold decision making responsibilities as well as longer term processes. They therefore need long term commitment and resourcing, support from elected representatives and executive teams, and strategic advocacy efforts to influence and enact change.

Successfully addressing the below areas and actions will rely on community voice/evidence, buy-in from elected representatives, joint advocacy efforts, and leadership and political awareness to seize and drive opportunities for change. Ensuring you have a director from council who understands and champions this work is highly recommended.

7. Local laws and enforcement

Victorian councils have the power to make local laws for their municipalities, according to powers granted by the *Local Government Act 1989* and subject to relevant legislation. All local governments have a range of local laws that help to create healthy environments for their communities, covering issues such as tree management, nature strips, parking, residential noise, food safety, recycling and waste disposal, pets and animals, smoke- and vape-free zones, and alcohol consumption in public places.

Local governments are also responsible for enforcing some state laws, including provisions of the *Tobacco Act 1987* and *Environment Protection Act 2017*. They undertake enforcement activities to help control and prevent harmful activities of commercial organisations, such as the sale of tobacco and vapes to children, and illegal dumping of industrial waste.

There is some scope for local governments to make local laws to help protect and conserve the local natural environment from the activities of commercial organisations, by regulating waste disposal and management, and noise and emissions from commercial premises.

Local laws can also be used to help address housing supply and affordability by encouraging a shift away from the use of property by short-term accommodation providers to long-term rentals. For

example, the City of Yarra and the City of Melbourne are considering proposals to introduce a cap under local law on the number of days properties can be rented for short stays, and other local governments have introduced annual or registration fees for short-stay accommodation providers.

Action examples:

Strengthen local laws on the environment

Consider opportunities to strengthen local laws to help protect the local natural environment, including through an Environmental Management Plan.

Make or strengthen short-stay local laws

Consider whether there is a need to introduce or strengthen local laws in relation to short-stay accommodation, such as to introduce caps or fees. This may depend on the housing needs of the municipality and whether use of housing for short stays is common.

Local laws regulating short-stay accommodation providers

In response to the increase in short-stay accommodation and diminishing long-term rental housing, Warrnambool City Council, Mornington Peninsula Shire and Bass Coast Council have all made new local laws regulating short-stay accommodation providers introducing higher standards and registration or annual fees, ranging from $300 to $400.

These local laws reflect the local governments' efforts to balance the economic benefits of tourism with the wellbeing and sustainability of their communities.

Resources

- Local Government Victoria Local Laws webpage

- City of Melbourne Environment Local Law 2019 which includes an Environment Management Plan

- City of Melbourne's Proposed Short-Term Rental Accommodation Policy

- Environmental Protection Authority resources for local government

- VicHealth Local Government Partnership Strengthening Tobacco Control Module Supplement

8. Planning

Many local governments in Victoria are using their planning powers to help address commercial influences on health and wellbeing, such as by amending local planning schemes to help control EGMs and alcohol outlets in their communities, and to ensure new private housing developments have positive community impacts.

It is important to note, however, that actions in this area may be challenging, and require significant time and resources. Seeking changes to planning schemes is an involved and lengthy process, requiring extensive community consultation and Ministerial approval. In addition, there are limitations to the scope of planning for pursuing health objectives, as health is not an objective of the *Planning and Environment Act 1987*, meaning that VCAT is unlikely to uphold health as a relevant consideration in planning decisions.[12]

The main opportunities for local governments to use planning to address CDoH are to influence the supply of gambling and alcohol, and the impacts of private developments. There are different planning scheme provisions and decision-making considerations for each of these areas, meaning that separate policies and approaches will be needed.

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12. Hunt Club Commercial Pty Ltd v Casey CC [2013] VCAT 725.

Gambling and alcohol

Local governments can use planning permit decisions, local planning policies and planning scheme amendments to help control businesses supplying alcohol, and EGMs in their municipalities.

Businesses generally require planning permits to supply alcohol or have EGMs, which are decided by local governments. Local governments can decide to refuse planning permit applications or to impose permit conditions on these businesses, such as to restrict trading hours. Although local governments' planning decisions can be appealed to VCAT, local governments can develop local planning policies and seek to have them adopted as amendments to the local planning scheme (in the Municipal Strategic Statement) to make it more likely their decisions will be upheld. These policies can set out local governments' planning objectives and policies with respect to issues such as the location and trading hours of licensed premises and EGM venues.

For more information, see section 3.5, 'Local government can influence the consumption of alcohol products in licensed venues' in the The Art of Community Alcohol Management guide (pages 23-31) and the Victorian Local Governance Association Reducing Harm from Gambling fact sheet.

New developments

Planning scheme amendments, local planning policies, and planning tools (including permits, agreements and incentives), can be used by local governments to influence the health and wellbeing impacts of new private developments in their municipalities.

Voluntary agreements, known as 'Section 173 Agreements' are made under Section 173 of the *Planning and Environment Act 1987*. They provide an opportunity for local governments and developers to negotiate agreements at the time development proposals or planning scheme amendments are being considered by councils. These agreements can make provision for community benefits, such as provision of affordable housing and green and sustainable infrastructure, in exchange for planning approval for the development or other incentives (e.g. approval of a higher number of stories).

Local governments have used these and other planning tools to secure health, wellbeing and sustainability benefits for communities from private developments. For example, the City of Port Phillip's Percent for Art Scheme is an innovative scheme which requires private developments with a total project cost of more than $2 million to contribute 0.5% of that cost to providing public art for the community.

Many local governments have environmentally sustainable development local planning policies, which are integrated in their local planning schemes, and require private developers to meet environmental performance standards for new developments, such as improving the sustainability of new buildings and reducing carbon emissions. These policies are leading to improved sustainability outcomes across the state.[13]

Some local governments have included requirements in their local planning schemes for developers to submit a Sustainable Design Assessment or Sustainability Management Plan when lodging a planning permit application. For example, Merri-bek City Council's planning scheme requires developers to provide information across energy, water resources, indoor environmental quality, stormwater management, transport, waste management and urban ecology. Merri-bek also strongly encourages developers to adopt zero carbon approaches, as set out in a suite of resources on zero carbon developments, covering topics such as electric vehicle and green infrastructure, and solar panel systems.

There are also opportunities for local governments to seek amendments to the Victorian planning scheme to improve requirements for new developments.

Action examples:

Develop internal resources or guidance on planning and CDoH

Consider developing or commissioning internal resources or guidance materials on how Council can use its planning powers and tools to help address different aspects of CDoH, such as alcohol, EGMs, affordable housing, and the sustainability of new developments.

Consider opportunities to develop or strengthen local planning policies

Consider and consult internally on whether there is scope to develop or improve local planning policies on licensed premises, EGMs or environmentally sustainable design. This is likely to involve local research, community engagement and consultation.

Consider other opportunities to embed health and wellbeing in new developments

For example, the Tower Hamlets local authority in London requires new large developments to undertake a Health Impact Assessment under its Local Plan, which considers issues such as the open spaces for social connection and outdoor play for children, and active transport routes through developments.

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13. Council Alliance for a Sustainable Built Environment (CASBE) website, https://www.casbe.org.au/what-we-do/state-local-planning-policy/.

Mansfield Shire Council's amendment of the Planning Scheme to restrict EGMs

In 2010, in response to advocacy from the local Mansfield community, Mansfield Shire Council successfully proposed an amendment to the Mansfield planning scheme (clause 52.28) to include an EGM policy. The amendment prohibits EGMs in the strip shopping centre in the centre of Mansfield Town and other sensitive areas of Mansfield. In 2011, the council relied on the amendment to successfully oppose the introduction of EGMs in the Delatite Hotel in the centre of the town.

In preparing the amendment, the Council commissioned and published the Mansfield Shire Gaming Policy Framework. This provided a planning framework and strategic justification for a local planning policy for EGMs in Mansfield Shire and set out a draft policy for inclusion within the Mansfield Planning Scheme. The Council also commissioned a survey of 400 Mansfield community members, finding that most opposed the introduction of additional EGMs in the Mansfield town.

City of Melbourne Green Factor tool

The Green Factor tool was developed by the City of Melbourne as a practical solution for integrating green infrastructure into developments.

Offered at no cost, the Green Factor tool enables assessment of environmentally friendly construction and alterations, providing a valuable resource for the development industry to assess and benchmark greening proposals. Its integration into the Planning Scheme (through Amendment C376 Sustainable Building Design) reflects Melbourne's commitment to embedding sustainability in the planning framework.

Under the amendment, new developments must achieve a minimum Green Factor score of 0.55, with a desired score of 0.55 for alterations and additions exceeding 1000sqm gross floor area.

The City of Melbourne's Green Factor tool offers a practical and replicable model for councils seeking to incorporate green infrastructure into developments, contributing to the creation of resilient and sustainable developments.

Resources

- City of Melbourne Affordable Housing Strategy
- City of Port Phillip Public Art Developers Guidelines
- CASBE website: state and local planning policy

9. State and federal advocacy

While there is significant scope for local government action to address CDoH, many of the changes needed are to state and national policies and systems. Local governments are powerful advocates for policy change, especially when they advocate collectively in alliances. An assessment of current alliances and groupings, or finding councils with like issues or concerns, to come together can amplify concerns about the commercial actors within their municipalities and convene action that state and federal governments may take notice of.

There are numerous opportunities to advocate for state and national level policy reform to address CDoH, across a broad range of issues, such as:

- Introducing higher standards in relation to the supply and marketing of harmful products.

- Amending the *Planning and Environment Act 1987* to ensure health is a relevant consideration in planning decisions.

- Changes to planning law to increase the power of local governments to require affordable housing, sustainable design, and health and wellbeing benefits, as part of new developments.

- Increased investment in affordable housing, active transport infrastructure and renewable energy.

- Increased funding to improve equitable access to quality essential goods and services in the community, including medicines, healthcare, education, and sports and recreation.

Action examples:

- Consider forming or funding alliances with other local governments and also consider and include community partners to increase political power, and pool funding, resources and expertise.

- Seek agreement to policy and advocacy positions across Council and develop position statements. Review data and evidence, and consult with people with lived experience, community groups and other experts and stakeholders to inform policy development.

- Participate in government consultations and engagement opportunities when they are offered, seek individual or group meetings with appropriate Ministers and local representatives.

- Consider if there is an opportunity, or if it is appropriate to the issue, to develop or fund advocacy campaigns which put Council's position in the public domain and seek active support or action from the community. The review of the *Planning and Environment Act 1987* is an example of an opportunity to influence through collective advocacy.

Case Study

Local Governments and the Alliance for Gambling Reform

In the ongoing battle against the harmful and unfair impacts of gambling, numerous local governments have partnered with and provided funding to the Alliance for Gambling Reform. This strategic coalition, launched in October 2015, has become a powerful advocate for reforms to the gambling industry to prevent the harms it causes. For the more than 25 Victorian local councils involved, the Alliance for Gambling Reform provides a critical platform for collective advocacy against the pervasive influence of EGMs in local communities. The Alliance also campaigns strongly against online gambling, and gambling advertising.

Resources

- [Alliance for Gambling Reform](#)
- [MAV Policy and Advocacy](#)
- [Council Alliance for a Sustainable Built Environment](#)
- [Regional Victorian Greenhouse Alliances](#)
- [Baw Baw Shire Council's Community Advocacy Toolkit](#)
- [Public Health Advocacy Institute of WA's Advocacy Toolkit](#)
- [Global Road Safety Partnership Advocacy Tools](#)
- [Mind Tools – Crafting an elevator pitch](#)
- [VicHealth Values-based messaging for health promotion](#)

10. Alternative economic models

Around the world, governments are adopting new economic models and approaches, such as a "wellbeing economy", that prioritise the health and wellbeing of people and the community above economic growth and profit.[14]

There are a number of ways governments can approach alternative economic models. The case study and resources below provide an introduction to actions in this area.

Case Study

A wellbeing economy for Mount Alexander

In collaboration with the Castlemaine Institute, Mount Alexander Shire Council is championing the development of a local economy centred on wellbeing.

With funding from WWF-Australia, Castlemaine Institute is developing a community vision for a wellbeing economy for the Shire. Departing from traditional economic approaches that create inequities, the community vision will seek to guide Mount Alexander's transition to an inclusive and regenerative local economic system that contributes positively to the wellbeing of the natural environment and community and fosters inclusive community ownership and wealth building. At the same time, Mount Alexander Shire Council is working with the Castlemaine Institute to embed these approaches in its Economic Development Strategy. These two key wellbeing economy projects are both informed by broad community engagement and participation.

It is intended that the community vision and Economic Development Strategy will serve as a blueprint for local governments across Australia seeking to shift towards equitable, community-led and wellbeing-focused economies.

Resources

- VicHealth Wellbeing Economy website and toolkit

- Wellbeing Economy Alliance website

- Australian Government's Measuring What Matters: Australia's First Wellbeing Framework

- VicHealth and the George Institute, Integrating wellbeing into the business of government report

- Regen Melbourne's Greater Melbourne City Portrait (measurement tool using doughnut economics)

- North Ayrshare Scotland Community Wealth Building Strategy

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14. Wellbeing Economy Alliance, https://weall.org.

Further Information

Stay up to date with the VicHealth Local Government Partnership.
Visit: www.vichealth.vic.gov.au/programs-and-projects/local-government-partnership

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