

Cyflwynwyd yr ymateb i ymgynghoriad y [Pwyllgor Iechyd a Gofal Cymdeithasol ar Atal iechyd gwael - gordewdra](#)

This response was submitted to the [Health and Social Care Committee](#) consultation on [Prevention of ill health - obesity](#)

**OB35 : Ymateb gan: Food Policy Alliance Cymru (FPAC) |
Response from: Food Policy Alliance Cymru (FPAC)**



Health and Social Care Committee – Inquiry into Prevention of Ill Health - Obesity
Food Policy Alliance Cymru (FPAC) consultation response
7th June 2024

This response from Food Policy Alliance Cymru highlights a number of areas that could be considered with regards to Welsh Government strategy, regulations, and associated actions to prevent and reduce obesity in Wales. Broadly these have been categorized under the following headings:

Framing of the issue, Food Culture and a national strategy aligned to the Well-being of Future Generations Act
 Children and early years
 Planning, Advertising and Promotion
 Resourcing delivery infrastructure
 Data collection and Monitoring

1. Framing, Culture and Strategy

- Food needs reframing - food must not be the problem – it is something to celebrate, share, connect with and nourish both body and mind. Feeling good and having dominium over personal nutrition should be the public facing framing, together with overcoming the structural issues, recognising people/ communities in Wales must have equal access to affordable, nourishing, sustainable food - without which, Wales will not be able to achieve the seven national well-being goals. Action and messaging should recognise that obesity is just one outcome of poor diet. Focus should be on the overall benefits to physical and mental health of healthy eating rather than focusing exclusively on obesity. Research from Cardiff's Child friendly cities (2022) showed that the most common reason children were bullied was "because of their weight".
- Leverage Wales' rich heritage and culture around food to inspire choices which are good for people (both mentally and physically). This could be part of a national food strategy and local food strategies co-ordinated through cross-sector food partnerships and aligned to the Well-being of Future Generations Act.
- Consider how a food strategy for Wales would help deliver integrated benefits (ensuring that food is linked to health, rural economies, food security and environmental impact etc rather than trade targets and nature targets acting against each other). Given the severity of these interlinked challenges action on obesity and diet related disease can only be meaningful in that context, under the framework of the Well-being of Future Generations Act.
- Consider where Welsh Government has powers to ensure healthy and sustainable food is more affordable than unhealthy foods. The Food Foundation¹ has highlighted how healthier options cost more than twice as much per calorie compared to less healthy options and are often either not available or less convenient, while the most deprived in society need to spend up to 50% of their disposable income on food just to meet the cost of the Government recommended healthy diet.
- Recognise and review the increasing problem of lack of accessibility of healthy, fresh food in many areas of Wales. Develop and implement a strategy to help communities address this deficit in conjunction with cross-sector food partnerships and reclaim greater sovereignty over available food choices.
- Carry out a cost benefit analysis and take an economic lens on diet-related ill health (e.g. diabetes costs) and drive investment into preventative measures such as early years, education, supporting people on low

¹ [Election 2024: Nourishing the Nation | Food Foundation](#)

incomes to access fresh food using the Marmot 8 principals as a framework². Think creatively about how new economies around food education could be created by leveraging farmers, producers and hospitality sectors to support the education of children and young people.

- Address dietary health inequalities through innovative approaches that are of benefit both to recipients and local economies rather than driving sales through large retailers (as in the case of Healthy Start, School Holiday Vouchers and food banks). The Sustainable Food Places Network has examples of where this is happening, for example Food Cardiff's "["Planet Card" pilot](#)" aims to make healthy, planet-friendly food accessible and affordable for everyone – especially those facing low incomes and health inequalities. Consider how social prescribing can be used in this context. [Alexandra Rose](#) has reported how after just 8 months of receiving vouchers for fruit and veg, 80% of participants are eating five portions of fruit and veg each day, compared to just 28% at the start of the programme. 9 in 10 participants have seen their physical health improve, including healthy weight loss, higher energy levels and better digestion.
- The needs of some of our most vulnerable citizens/ marginalized groups must be fully understood; co-production and community centered approaches should be prioritized to secure access to healthy options e.g., for people with health conditions or impairments, people from ethnic minorities and socioeconomically disadvantaged communities.
- Target resources and interventions heavily towards early years and children (breastfeeding, weaning and early years)

2. Children and early years

- Mandatory Food Literacy should be introduced from early years and throughout school. This should include cooking skills and practical experience of where food comes from and how methods of production impacts on nutrition, environment and prosperity. As well as how advertising and marketing influence our food choices. Examples include [Cook 24](#), [School Food Hour Pilot \(including Nutrition Skills for Life\)](#) and [Food for Life](#)
- Review school food standards in the context of current UK diets and population dietary improvements needed to optimise the health and wellbeing of our future generations considering aspects such as contemporary thinking on nutrition, including on the importance of gut health. Make the provision of truly healthy school food mandatory within that new framework and ring-fence resources to fulfill that requirement (effectively this is the same as ring-fencing NHS budgets but in the long run much better value for money). Recognise the key contribution of catering staff by raising the status of their jobs to develop skills and autonomy in the production and procurement of schools food.
- Reform menus and procurement so that they align with produce locally produced in Wales and to include 2 portions seasonal veg – local and organically grown.
- Introduce a robust monitoring of the school meal service to ensure standards are being met and plate waste is being monitored
- Introduce Universal Free School Meals to secondary schools

• ² Give every child the best start in life
 • Enable all children, young people and adults to maximise their capabilities and have control over their lives, Create fair employment and good work for all, Ensure a healthy standard of living for all, Create and develop healthy and sustainable places and communities, Strengthen the role and impact of ill-health prevention, Tackle racism, discrimination and their outcomes, Pursue environmental sustainability and health equity together

- All flying start areas should have dedicated dietetic support
- Continue to expand Food and Fun and consider the mechanisms required to ensure the provision is maximized in areas of need - especially in light of the decision not to pursue the reform of the school year
- Consider whether the Healthy Start Scheme is fit for purpose or whether an alternative use of the funding would better suit the needs of recipients in Wales.
- Ultra-processed foods (UPF) are a rapidly emerging concern, [particularly in children's diets](#). Many UPF are high in fat, salt, or sugar (HFSS), and many HFSS products are ultra-processed. There is considerable overlap (though a sizable segment of UPF falls out of the HFSS category) and the prevalence of both in the UK diet is concerning and demands a response. Governments should press ahead with actions to restrict the marketing and consumption of HFSS products, within a food strategy that aims to re-balance diets away from UPF. Action on HFSS should be seen as a necessary first step to addressing ultra-processed diets.
- There is public appetite for government action on ultra-processed foods (UPF). [Polling from the Food Farming and Countryside Commission](#) has found high public concern for ultra-processed foods, and appetite for government and businesses to respond, with nationally representative surveys finding that 74% of people would welcome government action on ultra-processing.

3. Planning, Advertising and Promotion

- Update Planning laws and integrate public health into planning process. Support local authorities to enact their powers to improve local food environments by using planning rules to reduce the number of unhealthy fast food outlets and restrict local advertising of unhealthy food, and by supporting the establishment of cross-sector food partnerships in every local area to help create a more healthy, sustainable and fair local food system
- Consider the legislative framework for food retail and hospitality in Wales in relation to devolved powers and consider how the current environment (planning/rates/environmental health etc) impacts comparatively on the viability of large chains and small local independent businesses (linked to accessibility of healthy food above).
- Consider the use of tax making powers e.g. rate relief for small businesses providing healthy food
- Restrict Marketing on HFSS food and drink as seen with Transport for London, Bristol, Greenwich, Haringey, Merton, and Southwark and developing work in Cardiff and the Vale of Glamorgan. Welsh Government should also consider underwriting or other mechanisms to mitigate potential revenue losses for local authorities who implement HFSS restrictive advertising policies
- **Invest in advertising for healthy and sustainable foods** (particularly healthy options like fruit, vegetables and pulses) to drive aspiration and to normalise consumption, building on the work of initiatives like [Veg Power](#) where 77% of parents whose children took part in the Eat Them to Defeat Them campaign said they ate more vegetables as a result.
- Improve healthy food and drink provision in public sector settings through national procurement, with particular attention to health promoting healthcare settings. There is a need for renewed emphasis/policy and guidance on healthier choices for public and staff in hospitals, leisure, youth and public places.
- The Healthy Weight, Healthy Wales strategy includes actions for some of these issues relating to the food and drink environment, but progress appears to have stalled.

4. Resourcing delivery infrastructure

- Invest in [Nutrition Skills for Life](#) across all HB areas and ensure adequate resource is available to support schools, local food partnerships and delivery of public health plans³
- Invest in [Cross-sector food partnerships](#) and the infrastructure required, in every local authority area in Wales with a focus on actions supporting access to healthy food for those on low incomes, development of local supply chains and supporting a positive food culture.
- Commit to an ambitious horticulture growth plan for Welsh Farmers centred around organic production which can support the production and increased consumption of minimally processed alternatives to meat, such as vegetables and legumes and ensure Wales is not unsustainably reliant on imports.

Data Collection and Monitoring

- Consider whether the current data collection to monitor healthy and sustainable diets is adequate. For example in England the Childhood Measurement Programme records the height and weight of school children in Foundation/Reception year (children aged 4-5) and Year 6 (children aged 10-11). This is important for ensuring that children are not underweight as well as monitoring overweight and obesity. Wales also has a different mechanism for measuring Adult Healthy weight which may lead to under reporting as claimed by Nesta. [Wales' hidden obesity problem could be worse than any other UK nation, new analysis finds | Nesta](#)
- Consider an additional indicator for dietary health that encompasses a more holistic approach
- Some of these action areas and measures are included in HWHW delivery plans, however the delivery plans do not seem to be on track. More work is needed to monitor and review this strategy to evaluate how effective current delivery structures are and whether organisational relationships/cultures are optimising the urgent progress required. We would welcome a summary of system wide achievements for 2022-2024 and improved communication regarding progress with future delivery plans.

[Food Policy Alliance Cymru](#) is a coalition of organisations and stakeholders building and promoting a collective vision for the Welsh food system.

Through collaboration, engagement and research the Alliance aims to:

- Co-produce a vision for a food system in Wales that connects production, supply and consumption and gives equal consideration to the health and wellbeing of people and nature.
- Advocate for policy change to address climate and ecological emergencies, the public health crisis and the rise in food insecurity.
- Ensure Wales is linked to UK policy, research opportunities and the broader global system

The following members of Food Policy Alliance Cymru have contributed to this response:

Food Sense Wales; Social Farms & Gardens; Gweithwyr y Tir - Landworkers' Alliance Cymru; Urban Agriculture Consortium; Nature Friendly Farming Network Cymru; WWF Cymru; Soil Association Cymru; Dr Angelina Sanderson Bellamy, Association Professor of Food Systems, UWE Bristol; Prof Terry Marsden, Cardiff University; Simon Wright, Broadcaster and restaurateur.

³ [Promoting healthy environments, skills and communities in Wales: the Nutrition Skills for Life® programme - J Lisa Williams, Dr Megan Elliott, 2022 \(sagepub.com\)](#)

This consultation may be published and will also be published on <https://www.foodsensewales.org.uk/good-food-advocacy/food-policy-alliance-cymru/>

Any queries may be directed to foodsensewales@wales.nhs.uk