

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](#)

OB18 : Ymateb gan: Food and Drink Federation (FDF) Cymru | Response from: Food and Drink Federation (FDF) Cymru



Welsh Parliament: Health and Social Care Committee inquiry on the prevention of ill health – obesity

FDF Cymru Response

1. Introduction

The Food and Drink Federation (FDF) Cymru represents the food and drink manufacturing industry in Wales. We are Wales' largest manufacturing sector, accounting for nearly 15% of total manufacturing turnover. Our gross value added to the economy is £1.7 billion, representing over 13% of Welsh manufacturing value added. We have 595 food and drink manufacturing businesses, employing 25,000 people, which represents 18% of the Welsh manufacturing workforce. In 2023, manufactured food and drink exports from Wales exceeded £0.7 billion.

We support the Welsh Government's goal to reduce obesity and improve health outcomes for people in Wales. We welcome the opportunity to respond to the Health and Social Care Committee inquiry. Our response is focussed on our areas of expertise and provides our perspective on existing policy, the impact of social and commercial determinants of obesity, and international examples of success.

2. Areas for improvement in existing policy and the current regulatory framework

We support the Welsh Government's goal to reduce obesity and recognise the important role we play within the food environment to support people to make balanced healthy choices. We do not believe there is a silver bullet to tackling obesity. We believe that a holistic, whole systems approach addressing all aspects of diet and promoting an active lifestyle, is needed to achieve public health goals.

As food and drink manufacturers, we see a focus for us in three broad areas: innovating to provide healthier products; supporting workplace and community health through a whole systems approach; and clear and consistent messaging, such as nutrition labelling.

Innovating to provide healthier products

The UK Food and Drink Federation (FDF) and its members are committed to voluntary reformulation and innovation to develop products with an improved nutritional profile, as well as offering a range of appropriate portion sizes, and have made substantial progress to date.

As a result, compared to eight years ago, the UK FDF member products contribute 13% fewer calories, 15% fewer sugars, and 24% less salt to the average shopping basket¹. [Our report²](#) provides a snapshot of some of our industry's most recent achievements.

¹ Kantar Worldpanel data for FDF members, total nutrient volumes in 2022 vs 2015.

² The report will be updated in September 2024 with new data.

A healthy diet is not all about cutting back on certain foods or nutrients. Most of the top dietary risk factors are linked to the elements of the diet that we do not get enough of including whole grains, fruit, legumes, nuts, seeds and fibre. To address this, in 2021 we launched our 'Action on Fibre' initiative, working with 25 brands to help make higher fibre diets more appealing, normal and easy for the population. The initiative is already having a demonstrable impact, delivering 4.3 billion servings of fibre delivered to the population (equivalent to 3.1 billion bowls of bran flakes or 4.5 billion slices of wholemeal bread) in the first year³

In 2023, we surveyed our members to find out how what would support them in this space. Key areas identified where Welsh Government could support include:

- Provide broader and more accessible financial support for reformulation and healthier product innovation, through existing R&D tax credits, grants and capital allowance schemes. This should include bringing capital within the scope of R&D tax credits, thus allowing companies to offset the significant upfront costs that can often prevent further investment in product reformulation and innovation.
- Establish funding for regional or national programmes based on the Scottish Government-funded Reformulation for Health Programme. At a cost of £300,000 per annum, it has successfully supported smaller companies in changing recipes in line with public health goals. We estimate a scheme could be established in Wales for c£250,000 per annum. Please see further details in section 4.

A Whole-Systems Approach

Our industry recognises the important role we play in supporting healthier lifestyles. As part of this, our members have a proud history of working with partner organisations to support communities, as well as delivering extensive workplace health initiatives.

We believe there is a real opportunity to build on existing workplace and community programmes, to broaden their reach and to improve health outcomes by working in partnership with others through a whole-systems approach. Several of our member companies are exploring this by working in partnership with [MoreLife](#) and Leeds Beckett University to pilot a whole-systems approach around specific factory sites, co-designing programmes with local partners.

As such we welcome the Welsh Governments commitment to delivering a whole systems approach to healthy weight as part of its Healthy Weight Healthy Wales programmes. To build on this, we believe the Welsh Government should work with industry to help build and amplify community programmes to explore the potential scope for expansion and delivering meaningful change in communities.

³ Based on self-reported data from FDF Action on Fibre members for 2021-2022

Clear and consistent messaging

Food and drink manufacturers continue to provide nutrition information on food labels and digital channels to help consumers make informed choices. However, we believe that more can be done to encourage and empower people to make healthier choices.

We believe that the Welsh Government should champion positive, practical messaging to support people to achieve a healthy lifestyle, as part of any public health campaign.

Promotional restrictions for food and drink high in fat, sugar or salt (HFSS)

We look forward to engaging with the Welsh Government on the upcoming consultation for enforcement of HFSS promotional restrictions and welcome plans to align with restrictions in England. This will support the speed and ease of implementation and ensure that the Regulation does not bring added burden and costs to businesses.

In the longer term, we understand that Welsh Government is examining the evidence base of introducing additional measures, such as restrictions on temporary price reductions and meal deals. We are concerned about the unintended consequences for Welsh businesses and consumers of these proposed measures, which go beyond what is already in place in England. Such restrictions will make it impossible for companies to maintain their commitment to fair and consistent pricing across the UK. This will impact Welsh consumers who will be disproportionately affected by increasing food prices in comparison to England. They will also remove an important lever for small Welsh businesses to break into the market and promote their products to a local audience.

3. The impact of social and commercial determinants on obesity

Working alongside partner organisations, our members have a proud history of supporting communities, for example through providing healthy options to breakfast clubs and redistributing surplus food to those who need it.

Food Redistribution

Our member companies have a broad reach across Wales and can play a key role in supporting local people. The Covid-19 pandemic and current cost of living crisis has exacerbated the stark inequalities in our society and the growing numbers living with food insecurity.

Working alongside partner organisations, our members have a proud history of providing healthy meals to breakfast clubs and redistributing surplus food to those who need it. In 2022, food and drink manufacturers redistributed more than 54,240 tonnes of surplus food – the equivalent of 129 million meals – an increase of nearly 20% from the year before, [according to WRAP](#).

Several FDF members also support the [Greggs Foundation](#) which aims to build stronger and healthier communities across the UK, including providing breakfast clubs which help to feed over 52,000 children daily. This important provision aims to end hunger as a barrier to education in schools by providing healthy food to children living with food insecurity.

4. International examples of success

The Scottish Government Reformulation for Health programme, the Danish Wholegrain partnership and Project Hexagon provide best practice examples of government and industry working in partnership to improve the nutritional profile of products and improve public health outcomes.

Wales – Project Hexagon

Project Hexagon, funded by the Welsh Government in 2019, was set up to support the bakery sector by introducing innovative raw materials into their products to make them healthier. Project Hexagon brought together a consortium of private sector bakery companies to work alongside new product development experts and global ingredients experts.

Scotland – Reformulation for Health

The Scottish Government funds the [Reformulation for Health](#) programme, hosted by FDF Scotland. This programme offers funding and tailored support to smaller businesses to develop healthier options in line with public health goals. This programme has had excellent success so far, funding 67 projects across the breadth of Scotland to improve the health of their products and communities.

The programme delivers a range of resources (such as an advice tool offering bespoke support, and the [Reformul8!](#) Programme, engaging food businesses across all 32 local authorities in Scotland), supported by funds offering small grants to financially assist businesses with the associated costs of reformulation. We believe we would see real value in expanding this best practice approach to small and medium sized businesses in Wales. We estimate a scheme could be established across Wales for £250,000 per annum.

Denmark – Whole Grain Partnership

The [Danish Whole Grain Partnership](#) is an excellent example of a public-private partnership that has had a significant effect on consumption and public health⁴. The partnership was established in 2008 to promote whole grain intake in the Danish population. The success of this programme includes:

- A significant increase in the average daily intake of whole grains from 36g per 10MJ before the campaign started to 82g per 10MJ in 2019.
- A significant increase in the number of products labelled with the whole grain logo, from 190 in 2010 to 1097 products in 2019.
- 68% of all Danes are familiar with the whole grain logo, and out of them, 80% say they also shop according to the logo.
- Awarded the EU Best Case certificate for achieving extraordinary results in the last 10 years.

Other international examples of success, such as the Amsterdam Healthy Weight programme and EPODE (Ensemble Prévenons l'Obésité Des Enfants' - Together Let's Prevent Childhood Obesity) demonstrate the importance of a holistic whole-systems approach.

⁴ Boyle et al (2023) Increasing fibre intake in the UK: lessons from the Danish Whole Grain Partnership

Amsterdam – Healthy Weight Programme

The Amsterdam Healthy Weight programme is a widely recognised example where prevalence of obesity was reduced by 12% from 2012 and 2015. This was achieved through several different measures including, healthy cooking classes in communities, focus on pregnant women and the first 1000 days of a child's life and a focus on targeting those of lower income and experiencing poverty.

France – EPODE

EPODE is a large scale coordinated approach for communities to implement effective and sustainable strategies to prevent childhood obesity. It is based on the results of a study implemented in two towns in France in 1992 (long term school-based intervention followed by community programmes).

The results showed that progress was made when implementing community-based programmes to support targeted school initiatives. The pilot launched in 8 towns in France and found a significant decrease of 9.12% in overweight and obesity between 2005 and 2009 for school children aged 5-12.

EPODE methodology was also launched in 2007 and 2008 in two towns in Belgium, where the prevalence of overweight in nursery school children showed a decrease of 22% - providing evidence of transferability⁵.

⁵ Borys et al (2012) EPODE approach for childhood obesity prevention: methods, progress and international development

The Food and Drink Manufacturing Industry

The Food and Drink Federation (FDF) Cymru represents the food and drink manufacturing industry in Wales. We are Wales' largest manufacturing sector, accounting for nearly 15% of total manufacturing turnover. Our gross value added to the economy is £1.7 billion, representing over 13% of Welsh manufacturing value added. We have 595 food and drink manufacturing businesses, employing 25,000 people, which represents 18% of the Welsh manufacturing workforce. In 2023, manufactured food and drink exports from Wales exceeded £0.7 billion.

FDF Cymru is a division of FDF. FDF is the voice of the UK food and drink manufacturing industry, the largest manufacturing sector in the country. Our industry has a turnover of £112 billion, which is over 15 per cent of total UK manufacturing, and Gross Value Added (GVA) of £30.0 billion⁶. Food and drink manufacturers directly employ over 478,000 people in every corner of the country⁷. Exports of food and drink make an increasingly important contribution to the economy, exceeding £20 billion in 2021, and going to over 220 countries worldwide. The UK's 11,675 food and drink manufacturers⁸ sit at the heart of a food and drink supply chain which is worth £116 billion to the economy and employs 4.1 million people⁹.

The following Associations actively work with the Food and Drink Federation:

ABIM	Association of Bakery Ingredient Manufacturers
BCA	British Coffee Association
BCUK	Breakfast Cereals UK
BOBMA	British Oats and Barley Millers Association
BSIA	British Starch Industry Association
BSNA	British Specialist Nutrition Association
CIMA	Cereal Ingredient Manufacturers' Association
EMMA	European Malt Product Manufacturers' Association
FCPPA	Frozen and Chilled Potato Processors Association
FOB	Federation of Bakers
GFIA	Gluten Free Industry Association
PPA	Potato Processors Association
SA	Salt Association
SNACMA	Snack, Nut and Crisp Manufacturers' Association
SSA	Seasoning and Spice Association
UKAPY	UK Association of Producers of Yeast
UKTIA	United Kingdom Tea & Infusions Association Ltd

FDF also delivers specialist sector groups for members:

Biscuit, Cake, Chocolate and Confectionery Group (BCCC)
Frozen Food Group
Ice Cream Committee
Meat Group
Organic Group
Seafood Industry Alliance

⁶ Source: ONS Annual Business Survey (2019).

⁷ Source: ONS Annual Business Survey (2019).

⁸ Source: ONS Business Population Estimates (2020).

⁹ Source: ONS Annual Business Survey (2019).