

Cyflwynwyd yr ymateb hwn i'r ymgynghoriad ar y Bil Bwyd (Cymru) Drafft

This response was submitted to the consultation on the Draft Food (Wales) Bill

FB002

Ymateb gan: | Response from: Aneurin Bevan Gwent Public Health Team

Question	Response
Why is the Bill required	
Question 1: Do you agree with the overarching principles that the Bill seeks to achieve?	<p>Yes. We agree with the principle of the need to establish a more sustainable food system that delivers on health, environment and economic objectives.</p> <p>Food system challenges are complex and cross cutting by nature. Recent research in England found that 16 separate government departments had responsibility for an aspect of food policy¹.</p>

¹ [Who makes food policy in England? A map of government actors and activities – Food Research Collaboration](#)

	<p>The establishment of a clear framework for action will support integrated action at local, regional and national levels.</p> <p>‘Brexit’, Climate Change and Covid-19 have all presented challenges for our health and wellbeing¹. This triple challenge has impacted negatively on food security for a wide range of population groups in Wales². This is now heightening with the cost of living crisis³ and the drought⁴ to create a strong case for the need for a long term food strategy to build a sustainable food system for Wales.</p> <p>Welsh Government’s ‘Healthy Weight: Healthy Wales’ Strategy (2019)⁵ aims to prevent and reduce overweight and obesity in Wales.</p> <p>Leadership and enabling change through a whole systems based approach is a core element of the strategy. This includes a focus on regional and local leadership, collaboration and involvement and enabling regional and local action.</p>
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¹ <https://phw.nhs.wales/publications/publications1/rising-to-the-triple-challenge-of-brexit-covid-19-and-climate-change-for-health-well-being-and-equity-in-wales/>

² <https://phw.nhs.wales/publications/publications1/rising-to-the-triple-challenge-of-brexit-covid-19-and-climate-change-for-health-well-being-and-equity-in-wales1/>

³ [More than £330m to help people tackle cost-of-living crisis | GOV.WALES](#)

⁴ [Natural Resources Wales / More parts of Wales move into drought status](#)

⁵ [Healthy weight strategy \(Healthy Weight Healthy Wales\) | GOV.WALES](#)

	<p>The Healthy Weight Whole System Approach programme is now being implemented in Health Boards across Wales, including in the Aneurin Bevan Gwent Public Health Team for the population of Gwent. This recognises the complexity of the causes of overweight/obesity as first set out in the Foresight Report for the UK Government¹. Work to tackle obesity will require an integrated multi-sectoral approach which addresses the structural change needed, rather than relying solely on changing the behaviour of individuals and treatment pathways².</p> <p>The inclusion of health within the food goals will facilitate greater engagement beyond the NHS from a wider range of public sector organisations who all have a role to play in tackling obesity. A stronger system of governance and reporting for food within public sector organisations will complement the Healthy Weight Whole Systems Approach.</p> <p>Gwent has the highest percentage (65%) of people who are living with overweight or obesity in Wales and this is projected to rise³. By 2050, the</p>
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¹ [Tackling obesities: future choices – project report \(2nd edition\) \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

² [Whole systems approach to obesity: A guide to support local approaches \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

³ [Adult lifestyles by local authority and health board, 2020–21 onwards \(gov.wales\)](https://gov.wales)

	<p>Foresight Report¹ forecasts that nationally (UK level) 60% of adult men and 50% of adult women will be living with obesity.</p> <p>In May 2022 Public Health Wales released the first set of data on children’s weight since 2018/19 (for Aneurin Bevan and Swansea Bay University Health Board areas).² The figures for 2020/21 demonstrate a significant rise in the average rate of obesity among 4–5 year old children in the Gwent region, up from 11.8% in 2018/19 to 18.3% in 2020/21. This 6.5 percentage point increase means that, in 2020/21, an estimated 1,097 4–5 year olds in Gwent started school already obese.</p>
<p>Question 2: Do you think there is a need for this legislation? Can you provide reasons for your answer.</p>	<p>Yes. Legislation is required to establish the core purpose of the food system in law. Duties on public sector organisations will ensure universal engagement across the food systems agenda, and improve the implementation of Welsh Government strategies including ‘Healthy Weight: Healthy Wales’.</p>

Food Goals

¹ [Reducing obesity: future choices – GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/reducing-obesity-future-choices)

² <https://phw.nhs.wales/services-and-teams/child-measurement-programme/cmp-2020-21/child-measurement-programme-report-2020-2021/>

<p>Question 3: Please provide your views on the inclusion of the Food Goals within the Bill as the means to underpin the policy objectives.</p>	<p>We welcome the introduction of the food goals as these set a clear vision and direction and will ensure that action is taken across the whole healthy sustainable food system agenda. The goals will provide a clear framework for action and will support integration of food policy objectives into policy across Government at all levels in line with the ‘health in all policies’ approach.</p> <p>A framework of food goals would also be consistent with and complementary to Wales’ well-being goals, which public bodies are working towards under the Well-being of Future Generations Act. This framework would provide the leadership vision for public bodies to deliver¹.</p> <p>In Gwent our experience from participating in local food partnerships also suggests that food goals will also help with communicating what is meant by a healthy sustainable food system as this can be a complex concept for both professional staff and the public. Again, this would be consistent with the narrative used in communicating Wales’ well-being goals.²</p>
<p>Question 4: Do you agree with the inclusion of a Primary Food Goal supplemented by Secondary Food Goals?</p>	<p>Yes, the primary food goal is helpful in outlining the overall vision, and the secondary food goals would facilitate better understanding of the top level actions that will be required to achieve this vision. Again, providing clarity to public bodies.</p>

¹ <https://www.futuregenerations2020.wales/english?category=vision>

² <https://www.futuregenerations2020.wales/>

	<p>The primary food goal is consistent with and would support the remit of the current local food partnerships that have been established in Gwent: Monmouthshire Food Partnership; Blaenau Gwent Food Partnership and Torfaen Food Partnership. All of these food partnerships either already have, or are working towards Sustainable Food Places¹ membership with the partnership of the Soil Association, Food Matters and Sustain. This includes a commitment to work across the environmental, health and economic agendas on food.</p> <p>The secondary food goals would ensure there is broad focus across this integrated agenda and that this is embedded in national, regional and local action.</p>
<p>Question 5: Are there additional / different areas you think should be included in the Food Goals?</p>	<p>Our experience is that the process of creating the food plans is important. Regional/local food plans that are the result of a comprehensive engagement process and public participation are more likely to embed a sense of local ownership, collaboration and involvement.</p> <p>For example, the recently published (July 2022) Birmingham Food Strategy² was based on a ‘Food Conversation’ which included holding focus groups with wide ranging ‘seldom heard’ voices from across the city. This is an example of applying the ‘involvement’ way of working in the Well-being of Future Generations Act.</p>

¹ [Home | Sustainable Food Places](#)

² [Birmingham food system strategy 2022 to 2030 | Birmingham food strategy system | Birmingham City Council](#)

<p>Question 6: Do you have any additional comments on the Food Goals, including the resource implications of the proposals and how these could be minimised?</p>	<p>Food system change is a complex area which regional and local public sector organisations will benefit from being resourced and supported to undertake.</p> <p>Some of the food goals may be best delivered on a scale greater than that of a single local authority, e.g. regional collaboration. Consideration could be given to local authorities working together on wider geographies to jointly tackle food goals. This would enable a more flexible use of expertise and resources and to align with existing partnerships. This collaborative approach would also be consistent with the Public Services Boards created under the Well-being of Future Generations Act.¹</p> <p>For example in Gwent, Torfaen County Borough Council, Monmouthshire County Council and Caerphilly County Borough Council have already collaborated on the Food 4 Growth programme funded by the UK Community Renewal Fund. This includes a focus on local supply chains, creating food networks and sustainable solutions to food poverty. Discussion is also underway on a</p>

¹ <https://www.futuregenerations2020.wales/english?category=public-sector>

	<p>possible future pan-Gwent collaboration on a Gwent-wide food strategy.</p> <p>Some food agendas e.g. public sector procurement are best tackled at a larger geography than a single public body. Collaboration on public sector procurement is already happening between local authorities in Gwent, for example via the CLES programme¹</p> <p>Further, there should be opportunities for sustainable purchasing of food at scale within and across sectors, for example the NHS Wales Shared Services Partnership (Procurement Services) which supports NHS Wales' health boards and trusts.</p>
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<p>Question 7: Please provide your views on the inclusion of targets within the Bill as the means to measure how the Food Goals are being advanced.</p>	<p>We support the introduction of targets and think that these are needed to give an indication of the scale of the ambition and the change that is required. Without targets, it would be difficult to measure progress.</p> <p>Food targets would be consistent with the architecture of national indicators and milestones in the Well-being of Future Generations Act, and there should be read-across.² E.g. Progressing food targets would also contribute to several of Wales' well-being goals.</p>
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¹ [Welsh Government | CLES](#)

² [Well-being of future generations | Sub-topic | GOV.WALES](#)

<p>Question 8: Do you agree with the process for setting the targets?</p>	<p>No response.</p>
<p>Question 9: Do you think the reporting mechanisms set out in the draft Bill provide sufficient accountability and scope for scrutiny?</p>	<p>No response.</p>
<p>Question 10: Do you have any additional comments on the targets, including the resource implications of the proposals and how these could be minimised?</p>	<p>No response.</p>

<p>Wales Food Commission</p>	
<p>Question 11: What are your views on the need for a Welsh Food Commission?</p>	<p>We agree that there is a need for an independent Food Commission to ensure progress is made towards achieving the Food Goals. This will provide accountability and scrutiny as well as support for implementation.</p>

	<p>Food is a complex agenda and Local Authorities / Health Boards would benefit from expert advice and support as they progress their Local Food Plans.</p>
<p>Question 12: Do you agree with the goals and functions of the Welsh Food Commission? If not, what changes would you suggest?</p>	<p>We broadly agree with the goals and function of the Welsh Food Commission as set out in the consultation document.</p> <p>However, we note that there may be a conflict between the twin roles of both supporting public bodies to develop food policies and yet also providing oversight and scrutiny of local food plans. This will need to be carefully managed, as local public sector bodies will need to be able to be open about the challenges and difficulties that they face and work in a genuinely collaborative environment to solve these. This will be compromised if the support is coming from a body that is also acting as their assessor.</p> <p>Consideration should be given to the role of the Auditor General for Wales and the Audit Wales office. The Auditor has an accountability role in the Well-being of Future Generations Act, and this is a powerful driver for public bodies.</p> <p>In 2017 the Auditor General for Wales audited public procurement in Wales, and the final report highlighted that the Auditor and Future Generations Commissioner are working together on additional guidance for public bodies including 'testing how the (WFG) Act can be</p>

	<p>embedded on purchasing food'. It would be helpful to learn of progress here, including in light of the 'Triple Challenge' highlighted above.¹</p>
<p>Question 13: Do you agree with the size of the membership of the Food Commission and the process for appointing its members?</p>	<p>No comment.</p>
<p>Question 14: What are your views on the proposal that the chair and members can serve a maximum term of five years and that an individual may be re-appointed as a chair or member only once? Do you believe this is appropriate?</p>	<p>No comment.</p>

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¹ [Public Procurement in Wales \(audit.wales\)](http://audit.wales.gov.uk/Public-Procurement-in-Wales)

<p>Question 15: Do you have any additional comments on the Food Commission, including the resource implications of the proposals and how these could be minimised?</p>	<p>No comment.</p>
<p>National Food Strategy</p>	
<p>Question 16: Do you agree that there is a need for a national food strategy?</p>	<p>Yes we agree that a national food strategy is needed. This is currently a gap as has been highlighted by Cardiff University in a Welsh Food System Fit for Future Generations¹. In particular, there is a need for greater integration of the health, agriculture, food and farming agendas at a national level.</p>
<p>Question 17: Do you believe the Welsh Government's current strategies relating to 'food' are sufficiently joined up / coherent?</p>	<p>We recognise that progress is being made by Welsh Government to join up key agendas. For example, the recent commitment to provide universal Free School Meals to all Primary aged children² also included the desire to increase the amount of locally produced food. This ties in with the commitment to produce a Community Food Strategy³ to strengthen local food supply chains.</p>

¹ [WWF_Full_Report_Food_Final_3.pdf](#)

² [Written Statement: Extending Free School Meal entitlement to all primary school children \(17 December 2021\) | GOV.WALES](#)

³ [Welsh Government – Programme for Government – Update](#)

	<p>However, we feel that greater integration is required. The ‘Healthy Weight: Healthy Wales’¹ long term strategy to prevent and reduce obesity includes a national priority area to shape the food and drink environment towards sustainable and healthier options. This priority would benefit from alignment with economic and agricultural policy so that longer term planning of Welsh food production could better meet health goals.</p> <p>There is a significant gap between the food that is produced in Wales and the Eatwell Guide². Whilst there will inevitably be limitations due to soils / land / climate etc., it would be good to have a policy framework that includes maximising the contribution that agriculture can make to the health agenda e.g. expansion of horticulture</p>
<p>Question 18: Does the draft Bill do enough to ensure that Welsh</p>	<p>No comment.</p>

<p>Ministers take advice and consult on the strategy before it is made. If no, what additional mechanisms would you put in place?</p>	
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¹ [Healthy weight strategy \(Healthy Weight Healthy Wales\) | GOV.WALES](#)

² [The Eatwell Guide – NHS \(www.nhs.uk\)](#)

<p>Question 19: Do you think the provisions of the draft Bill relating to reporting on the national food strategy are sufficient? If not, what changes would you like to see?</p>	<p>No comment.</p>
<p>Question 20: Do you think the provisions of the draft Bill relating to reviewing of the national food strategy are sufficient? If not, what changes would you like to see?</p>	<p>No comment</p>
<p>Question 21: Do you have any additional comments on the</p>	<p>No comment.</p>

<p>National Food Strategy, including the resource implications of the proposals and how these could be minimised?</p>	
<p>Local Food Plans</p>	
<p>Question 22: Do you agree that there is a need for local food plans?</p>	<p>Yes we think local food plans are needed. Action is needed by public bodies at all levels covering local, regional and national if we are to shift the food culture and achieve broad food system and Wales' well-being goals.</p> <p>It is worth noting that place based food strategies have been developed across the UK¹. These go beyond the remit of a single local authority or health board and reflect broad ownership of the agenda across business, voluntary, community and public sector. There are also examples where local authorities have published food plans that are solely focused on the actions that the local authority itself can take.</p> <p>We think that there is a need for local public sector organisations to act as convenors / in a facilitative role to lead food systems change through a collaborative approach with a broad range of stakeholders including businesses,</p>

¹ [Food Governance and Strategy | Sustainable Food Places](#)

	<p>voluntary and community sectors. If local food plans become just about public sector delivery then we will have lost an opportunity to build the local good food movement.</p>
<p>Question 23: Does the draft Bill do enough to ensure that public bodies consult on their local food plans before they are made. If no, what additional mechanisms would you put in place?</p>	<p>Given the whole systems approach and change which is required, in Gwent we would also consult with Gwent Public Services Board in its role to improve local well-being across the four pillars of well-being (WFG Act).</p>
<p>Question 24: Do you think the provisions of the draft Bill relating to reporting on the local food plans are sufficient? If not, what</p>	<p>Wales Acts introduced recently have different reporting arrangements and timescales for public bodies whilst being complementary Acts in vision, e.g. WFG Act and Environment (Wales) Act. This would be the case with the current provisions in this consultation. As a result of the urgency of the 'Triple Challenge', alongside Welsh Government priority strategies including 'Healthy Weight: Healthy Wales', public bodies should embed reporting on progress towards their local food plans in their corporate annual reports.</p>
<p>changes would you like to see?</p>	

<p>Question 25: Do you think the provisions of the draft Bill relating to reviewing of the local food plans are sufficient? If not, what changes would you like to see?</p>	<p>Yes we think reviewing every 5 years is sufficient. Consideration should also be given into how local food plans can align with key plans already in place and encourage public bodies to embed where feasible. For example, Local Well-being Plans (WFG Act) at regional/local level, and Integrated Medium-Term Plans (IMTPs) in Local Health Boards (organisational-level).</p>
<p>Question 26: Do you have any additional comments on local food plans, including the resource implications of the proposals and how these could be minimised?</p>	<p>No comments.</p>
<p>General Provisions</p>	
<p>Question 27: Do you agree with the list of persons defined as being a 'public body' for the purpose of this Bill?</p>	<p>We would suggest considering bringing the list of public bodies in line with the (statutory) list in the WFG Act. In Gwent, we are progressing our whole systems approach to healthy weight with Gwent Public Services Board, which is a strategic partnership with membership much wider than Gwent's five local authorities and Aneurin Bevan University Health Board.¹</p>

¹ [Member profiles – Gwent Public Services Board Gwent Public Services Board \(gwentpsb.org\)](http://www.gwentpsb.org)

	<p>The importance of a broad strategic partnership (wider than local authority and health board) is also highlighted in Gwent PSB’s decision to become a ‘Marmot Region’ to take refreshed action to reduce the inequalities between our communities in Gwent, working with the UCL Institute of Health Equity.¹</p> <p>Also note that the Welsh Government is consulting on extending the well-being duty (WFG Act) to eight additional public bodies.²</p>
Question 27: Do you have any views on the process for making regulations set out in the Bill?	No comment
Question 27: Do you have any views on the proposed commencement date for the Act?	No comment
General Views	

¹ <https://www.gwentpsb.org/wp-content/uploads/2022/03/03-Proposal-Gwent-Becoming-a-Marmot-Region.pdf>

² [Consultation on the additional public bodies subject to the well-being duty \(Part 2\) of the Well-being of Future Generations \(Wales\) Act 2015 \[HTML\] | GOV.WALES](#)

<p>Please provide any additional information relevant to the draft Bill.</p>	
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