

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

FB020

Ymateb gan: | Response from: BMA Cymru Wales

Question	Response
Why is the Bill required	
Question 1: Do you agree with the overarching principles that the Bill seeks to achieve?	<p>BMA Cymru Wales has also been clear in the belief that a healthy population is better protected from long term health conditions and infections, and that a healthy diet and food environment, and a reduction in climate change are all crucial parts of this.^{1 2}</p> <p>BMA Cymru Wales supports initiatives to generate a healthier food environment, address issues such as malnutrition and obesity and also</p>

¹ [BMA Cymru Wales: A manifesto for health, Population Health Page 4](#)

² [The Bevan Foundation: Hopes for the Next Senedd term- British Medical Association](#)

	<p>support measures aimed at tackling climate change.</p> <p>We therefore support those elements within the overarching principles of the proposed Bill.</p> <p>However, in this case the Bill has been quite widely drawn in terms of what it seeks to achieve and need more detail on its intended aims.</p>
<p>Question 2: Do you think there is a need for this legislation? Can you provide reasons for your answer.</p>	<p>As the aims of the Bill need more defining, we remain unconvinced of the need for this legislation at this time.</p> <p>Some aspects of its aims (e.g. tackling obesity) are already being taken forward and others might sit better with existing mechanisms, such as being included in the responsibilities of the Future Generations Commissioner.</p> <p>Consultation and engagement with the Commissioner would benefit the Bill.</p>
<p>Food Goals</p>	
<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 support clear aspects of what is included in the goals as detailed in our answer to Question 1.</p> <p>However, proposed food goals need to be more specifically defined so there is more clarity about overall intent of the Bill.</p>

<p>Question 4: Do you agree with the inclusion of a Primary Food Goal supplemented by Secondary Food Goals?</p>	<p>The goals at present result in the Bill's intent being quite wide and non-specific.</p> <p>Greater focus certain aspects of the proposed goals with greater clarity around what the Bill intends to achieve are needed.</p>
<p>Question 5: Are there additional / different areas you think should be included in the Food Goals?</p>	
<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>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>Some aspects of the Bill could be better addressed by targets in other areas, e.g. targets set to underpin the Welsh Government's obesity strategy.</p>

<p>Question 8: Do you agree with the process for setting the targets?</p>	<p>To reduce duplication of legislation, it will be important to ensure the Bill does not replicate targets already being set in as a result of other existing legislation and plans, such as Welsh Government’s Obesity Strategy and its current consultations on the Healthy Food Environment.</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>The provisions appear appropriate if steps have been taken to ensure this does not duplicate other existing reporting mechanisms.</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>It is difficult to assess this without seeing what targets might be proposed.</p> <p>Therefore more detail and clarity is needed at this stage.</p>
<p>Wales Food Commission</p>	
<p>Question 11: What are your views on the need</p>	<p>The proposed functions could be better picked up by the existing Future Generations Commissioner.</p>

<p>for a Welsh Food Commission?</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>Question 13: Do you agree with the size of the membership of the Food Commission and the process for appointing its members?</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>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>National Food Strategy</p>	
<p>Question 16: Do you agree that there is a need for a national food strategy?</p>	<p>As the strategy is intended to advance the food goals, more detail is needed on the proposed goals before a decision could be made on whether a national food strategy is required to underpin them.</p>
<p>Question 17: Do you believe the Welsh Government's current strategies relating to 'food' are sufficiently joined up / coherent?</p>	<p>It is crucial that more progress be made by Welsh Government on advancing its Obesity Strategy.</p> <p>However, once implemented, a period of time may be required before its effectiveness can be judged.</p> <p>Greater detail on how Welsh Government plans to assess the effectiveness of its Obesity Strategy would be welcome.</p> <p>While measuring the effectiveness of their strategy could take some time, a set of shorter term goals– to help measure the strategies</p>

	effectiveness in the shorter term– would also be beneficial.
Question 18: Does the draft Bill do enough to ensure that Welsh Ministers take advice and consult on the strategy before it is made. If no, what additional mechanisms would you put in place?	
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?	
Question 20: Do you think the provisions of the draft Bill relating to reviewing of the national food strategy are sufficient? If not,	

<p>what changes would you like to see?</p>	
<p>Question 21: Do you have any additional comments on the 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>As with our views on the need for a national strategy, the need for local plans can only be judged in the light of clearer and more specific goals.</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>	

Question 24: Do you think the provisions of the draft Bill relating to reporting on the local food plans are sufficient? If not, what changes would you like to see?

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?

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?

General Provisions

<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>Question 27: Do you have any views on the process for making regulations set out in the Bill?</p>	
<p>Question 27: Do you have any views on the proposed commencement date for the Act?</p>	
<p>General Views</p>	
<p>Please provide any additional information relevant to the draft Bill.</p>	