FOOD POLICY ALLIANCE CYMRU

Response to Welsh Government's Food Environment Consultation - September 2022

In order to create a positive change in the food environment there needs to be consensus on a collective vision for our food system in Wales and a subsequent integration of policy across all areas affecting food. The scale of the public health crisis is unprecedented with people in Wales facing a higher risk of dying in poverty than any other UK nation (Marie Curie); Almost 60% of adults in Wales are living with overweight or obesity (Public Health Wales); and the full social cost of obesity to Wales is around £3 billion a year (Frontier Economics). At a UK level the Food Foundations Broken Plate report (2022) describes how nearly 10,000 diabetes related amputations are carried out on average per year, an increase of 23% in five years. Looking at the prevalence of type 2 diabetes in England and Wales, there is a proportionally higher prevalence of type 2 diabetes in lower income groups and ethnic minority groups. Of all people with type 2 diabetes, 24% are in the poorest fifth of the population compared with 15% in the richest fifth.

The recommendations in this consultation provide some of the tools to shift towards more healthy food environments but without considering the whole system some of the recommendations could negatively impact upon other aspects of the food system such as local economies. For example smaller businesses may struggle to produce calorie labels and being required to do so could be to the detriment of local, seasonal menus, ability to respond to locally available ingredients or be the cause of additional food waste. The hospitality sector, and in particular independents, are experiencing extreme pressure due to the legacy of Covid, workforce issues and energy and food costs. There is also a risk that focusing on Kcal content of meals shifts focus away from other elements of the meal such as provenance of ingredients, social enjoyment and celebration.

The social, economic and environmental aspects of this proposal need to be considered alongside the health impacts and careful navigation around the impacts of low income households is needed. A recent paper by Isaccs et al (2022)[i] discusses how unhealthy food environments simultaneously push low-income families towards unhealthy products while supporting multiple other family needs, such as social wellbeing. Policies and interventions that focus on solely improving nutritional health therefore will be insufficient to address dietary inequalities if implemented in isolation since in the absence of other resources, people will still look to unhealthy food environments to serve social and emotional needs

These issues illustrate why Food Policy Alliance Cymru believes that Welsh Government should appoint an independent, cross sector Food System Commission. This commission should be tasked with developing a roadmap to deliver a 'Food System Fit for Future Generations', aligned with the principles of agroecology. The roadmap should consider six priorities which take account of the whole Food System . The private members Bill tabled last year and due to be presented to the Senedd in December aims to 'establish a more sustainable food system in Wales to strengthen food security, improve Wales's socioeconomic well-being, and enhance consumer choice'. The draft Bill lays out plans for a Food Commission and primary and secondary food goals recognising the systemic nature of the food system, and could be a key approach to developing more coherent policymaking.

Without this systems approach the proposals the Healthy Food Environment consultation could have limited impact on the £3billion societal cost to Obesity. For example, what we are currently

producing (i.e. Wales Food and Drink Strategy) and the way in which we are producing and supplying it in Wales does not meet the needs of current or future generations. Much production in Wales relies on value added, extractive and often unhealthy products (soft and alcoholic drinks, confectionary, bakery products) and is not aligned with population needs according to the Eatwell Guide. We only produce a quarter of one portion of veg on less than 0.2% of land. Unless all parts of the system are considered in harmony, there will only be limited impact as a result of the recommendations made here. Other considerations include those around social security, food education, planning, community resources, local food infrastructure, procurement, fair work, business support - the list goes on.

In particular the consultation misses the opportunity to draw on Welsh Government's commitment to developing a long-term strategy to promote a dietary shift toward the 'EatWell Guide' as part of its Net Zero Plan (which would mean a substantial increase in fruit and vegetables, a decrease in red and processed meats and dairy products and a decrease in foods high in fat and sugar). The net zero plan states "Welsh Government has agreed to develop a long-term strategy to promote a dietary shift toward the UK Governments 'EatWell Guide' by encouraging Welsh consumers to eat healthier, more sustainably sourced food, to eat and waste less." The current emphasis on restricting unhealthy foods in this consultation may be missing an opportunity to promote healthy and more sustainable options. Good examples here would be through initiatives such as Peas Please, Veg Power and maximizing the potential of the Healthy Start Scheme.

A further opportunity for integration would be with the Social Partnerships and Procurement Bill where opportunities to leverage the purchasing power of public sector organisations who provide catered and retail food to schools, hospitals, council owned facilities, workplaces etc - towards awarding contracts to suppliers who are providing healthy and sustainably sourced produce.

How do the proposals here link to the broader aims of other Programme for Government commitments such as the role out of Universal Free School Meals, the community food strategy, increasing the amount of locally sourced produce and the Sustainable Farming scheme? Are there more innovative ways to change the food environment through working with communities to understand and address their needs? Through developing a network of food partnerships? Through developing knowledge and expertise within schools and communities?

Examples of some of these approaches can be found on member websites:

Food Sense Wales – specifically the 2021/22 Impact Report

Social Farms and Gardens

Landworkers' Alliance

Sustainable Food Places

Broken Plate Report - https://foodfoundation.org.uk/sites/default/files/2022-07/FF_Broken_Plate_Report%202022_DIGITAL_3.pdf

Priorities for a Food System Fit for Future Generations https://www.foodsensewales.org.uk/app/uploads/2021/10/FPAC_English2021.pdf

Mind the gap - The rise in inequalities in Wales.pdf (nhsconfed.org)

ⁱ [From healthy food environments to healthy wellbeing environments: Policy insights from a focused ethnography with low-income parents' in England - ScienceDirect](#)