

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

FB022

Ymateb gan: | Response from: Diabetes UK Cymru

About us

Diabetes UK's vision is a world where diabetes can do no harm. We lead the fight against Wales' largest growing health crisis, which involves us all sharing knowledge and taking on diabetes together.

Over 209,015 people live with diabetes in Wales, equivalent to one in 13 people, the highest level of prevalence of any of the UK Nations. The last twenty years have seen a rapid increase in the diagnosis of diabetes; this is due in part to a growing rate of type 2 diabetes diagnoses, with an estimated 65,000 people in Wales living with undiagnosed type 2 diabetes.

The continued prevalence of obesity suggests that an estimated 580,000 people in Wales could be at risk of developing type 2 diabetes, the most common form of diabetes, accounting for 90% of all cases. By 2030 the number of adults with diabetes in Wales is likely to grow from 8% to 11%.

Further information on diabetes can be found on our website.ⁱ

Response

We thank the Member of the Senedd for Monmouth, Peter Fox MS, for submitting the Draft Food (Wales) Bill. We agree with the member that we need a more sustainable food system in Wales that improves Wales' socioeconomic well-being to encourage purchasing and consuming nutritional foods for a balanced diet.

Diabetes is one of Wales's biggest longstanding endocrine and metabolic conditions with obesity as its primary cause (for type 2) and overall complications. The current food environment is the major driver of the increased levels of obesity in Wales, increasing the health burdens associated with obesity.ⁱⁱ By allowing the continued increase in availability, accessibility, affordability, and marketing of foods high in saturated fats, trans fats, sugars and salt, which are highly processed, we are, in essence, on a non-stop train buffet, eating our way through to increased morbidity.

With increasing pressures on the cost of living, living healthily in the UK is not attainable for our most deprived. The Food Foundation states that the poorest fifth of homes with children must spend 42% of their disposable income to meet the Public Health 'Eatwell Guide'.ⁱⁱⁱ As well as the potential impact on the development of type 2 diabetes, such pressures may negatively impact type 1 diabetes health, with research from the University of Edinburgh unveiling that poorer living circumstances increase blood sugar levels. The current cost of living crisis will only increase the stresses and burdens of a family in a deprived area to support their children with type 1 diabetes to live well.^{iv}

However, food security has always been a concern in Wales, with 10% of households (before the recent inflation) recorded in the 2019 'The Food and You Survey' with low or very low food security.^v In the same survey, 17% of respondents reported that their household had worried in the last 12 months about running out of food before there was money to buy more, 13% running out of money before they could replenish the pantry, and 10% reported that they could not afford to eat a balanced meal.

Cross-party joined-up thinking is needed to ensure that by 2030 the number of adults with diabetes in Wales does not increase and that people who live with all types of diabetes live well.

Our response will focus on the four major proposals of the Bill:

- National Food Strategies and Local Food Plans
- The introduction of Food Goals
- The establishment of a Welsh Food Commission
- Tackling food waste

National Food Strategies and Local Food Plans

We agree with the Welsh Government's Programme for Government and the proposals in this Bill for a Wales Community Food Strategy to encourage the production and supply of locally sourced food in Wales.^{vi} Our food environments are changing rapidly and do not benefit our health, especially for low- and middle-income families with a comprehensive and heavily marketed availability of many products. Our food environments are the primary driver of increasing the burden of disease associated with obesity.^{vii viii} We hope such strategies will shape how our communities interact with food to promote positive food environments and help shape and influence our current and future generations' relationship with food.

Critically, our future generations' long-term health is at risk. Although limited by the pandemic, data collected in the Child Measurement Programme shows an increase in the number of children with obesity in Wales. Aneurin Bevan University Health Board and Swansea Bay University Health Board showed significant increases in the number of children with obesity and a substantial decline in the number of children with a healthy weight.^{ix} Concerningly, 57.2% of children with type 1 diabetes aged 4 to 5 years in Wales were overweight or obese (an increase from 47.2% in 2019/20) - more than double the 26.9% recorded in the Child Measurement Programme for Wales in 2018/19 (the latest data available).^x A positive food environment is needed at all stages of a child's development to reduce complications for long-term health conditions such as type 1 diabetes and prevent conditions such as type 2 diabetes. That is why we welcome positive steps to work with communities to develop National and Local Food Strategies that focus on the community's relationship with food and the reduction of the availability of poor nutrition and highly processed foods.

With oversight of school meals falling to school governors across Wales, plans should focus on a uniform policy for our schools and colleges, where we need to promote the best and

healthiest environments so that it becomes ingrained as normal and as part of children's every day. Schools should provide food education throughout all years, emphasising health and diet sustainability alongside accessibility to healthy, balanced and nutritional foods.

Diabetes UK welcomes a 'Whole School Approach' to healthy food and physical activity, which includes providing education through the years with an emphasis on health, diet, and sustainability. We also welcome structured and unstructured approaches to physical activity throughout the day, with food served in schools meeting high nutritional standards.

We, therefore, welcome the Food Plans at a local level which should incorporate and ensure that schools improve food culture and the availability of healthier nutritious foods. We also welcome plans at a National and Local setting to ensure that our most deprived communities can access good quality food.

People from the most deprived communities are likelier to live in neighbourhoods with more unhealthy food and drink outlets. This includes having more unhealthy online takeaway options.^{xi} Exposure to greater levels of takeaway outlets is associated with greater levels of obesity prevalence.^{xii}

Many local governments are utilising different methods to limit unhealthy food and drink outlets.^{xiii} An analysis is needed to understand which options are the most effective. A proposed Wales Food Commission could undertake such analysis.

As a member of Obesity Alliance Cymru, we support calls to strengthen national planning guidance to require planners to consider health and well-being when reviewing applications for further food outlets. We support the call for no additional fast-food takeaways near educational settings such as schools and colleges with a provision for a limit on the number of outlets in any given geographical area.

Such calls could form part of National and Local delivery plans with food targets set to reduce the availability of such takeaway options. Advertisement of the consumption of these foods should also be reduced and restricted at a local level, especially on property and areas governed by local authorities.

Advertisements of promotions have an essential impact on buying behaviors in Britain; before the pandemic, it was found that 34% of household expenditure was spent on promoted products.^{xiv} Most products advertised through price promotions are more likely to be higher in sugar or those that are 'less healthy'.^{xv,xvi}

Price promotions also result in consumers purchasing more than they otherwise would.^{xvii} Arguments that price promotions save the average family money are distorted. Contrary to comments proposed by the food and drink industry, multi-buy promotions are not an effective means for households to save money; instead, these promotions encourage further spending.^{xviii} A minute of junk food advertisement is enough to encourage children to eat additional calories.^{xix}

However, we agree with comments from the Welsh Government that although a Bill is welcomed to legislate for food plans to be developed, they can be developed and implemented now without requiring a long-drawn-out legislative process. As is highlighted, the impact of obesity and poor eating habits on our long-term health already has a detrimental impact; we welcome immediate action to start the work of promoting positive food environments.

Cardiff Council has already developed and consulted on a Food Strategy focusing on wanting “...everyone in Cardiff to have access to affordable good food, and to understand where their food comes from”.^{xx} The plan reviews positive actions that the Local Authority can undertake within the short, medium and long term over the next five years, introducing policies now that will have a positive impact in the communities in and around Cardiff.

We welcome proposals to improve food security in the City by providing increased availability of commercial urban food growing, developing food parks, developing sustainability marks for food businesses and a sustainable food network.

Local Food Plans developed today could include the provision and promotion of healthy, local, environmentally friendly, and good animal welfare food options; as well as de-incentivising and limiting non-healthy options. Some councils provide catering services for their staff, schools, events and meals on wheels. By developing a positive, sustainable food framework, corporate partnerships with the local authority will be positively affected. Improving access to good quality food in a multitude of services delivered all over the community could even extend to the provision of street-food licences and events.

We urge local authorities to consider implementing local plans to improve food environments and for the Welsh Government to develop its Programme for Government commitment to a Wales Community Food Strategy. In the absence of such plans being developed, we welcome the Bill to mandate them.

Introduction of Food Goals

With the development of National and Local Food Plans, supportive food goals for Wales are welcome. In support of a holistic approach to food and exercise to prevent and support people living with long-term conditions like diabetes, we welcome proposals such as the seven priority areas for the 2022-24 Healthy Weight, Healthy Wales Strategy.^{xxi}

The ambition set by the strategy is for Wales to become one of the first countries in the world to witness declining rates of obesity. With the strategy set in legislation under the Public Health (Wales) Act 2017, we welcome the strategy's continued delivery through five-year plans from 2020 – 2030.

By 2030 the strategy hopes to deliver an evidence-driven dietetic-led programme, reversing the trends in type 2 diabetes through weight management and focusing on a multitude of health and environmental factors that can impact and influence overall health and food environments.

We would welcome goals that support the current delivery of Healthy Weight, Healthy Wales with measured targets such as the reduction of the consumption of poor nutritious foods, the reduction in the number of permitted fast food and takeaway outlets in communities across Wales and the promotion and rollout of positive programmes such as the “All-Wales Diabetes Prevention Programme”.^{xxii}

This Bill will seek to continue to call for goals to be implemented beyond 2030 and, therefore, we welcome a continued commitment to reduce levels of obesity and promote healthier and positive environments with food and exercise.

The Establishment of a Wales Food Commission

We welcome the establishment of a Commission that would oversee the delivery of a Welsh Food Strategy alongside Ministers and other stakeholders. With reference to the Healthy Weight, Healthy Wales strategy, we would welcome a similar approach with task groups being set up by the Welsh Government Minister to oversee the development and implementation of goals and food plans.

Current membership of task groups set up through Healthy Weight, Healthy Wales would be welcomed as well as an evaluation of the delivery of the National Plans.

We would hope that there would be a shared focus of the Food Commission with the Healthy Weight Healthy Wales strategy with the ultimate aim of improving access to high-quality nutritious foods, reducing food poverty, improving community food environments, reducing consumption and promotion of HFSS and processed foods.

Tackling Food Waste

We support the reduction of food waste in Wales by reviewing current supply chains and consumption of locally produced foods compared to highly processed HFSS foods, with holistic community support for continued education around the consumption of healthier foods and portion size management.

The size of portions, packages, and tableware has increased over the last five decades, and a systematic review has shown that larger portions of food increase people’s consumption. It has been suggested that eliminating larger portions from the diet could reduce average daily energy consumed by 12-16% among UK adults.^{xxiii}

Economic analysis of different policy interventions has suggested that portion control is one of the most cost-effective and evidence-based options for reducing obesity.^{xxiv}

We welcome the Bill to help reduce portion sizes for food and drink at home with a consistent message across retail and out-of-home settings, with clear labelling on what is considered a portion size. Reformulating food to reduce free sugar and salt, and reducing the portion size of food, could significantly reduce early death and long-term health conditions and food waste.^{xxv}

Further development of policy to reduce food waste could require supermarkets and other retailers to donate unwanted and unsold food that is fit for human consumption to charities and food banks to help the most vulnerable in society—reducing food poverty and waste.

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