

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](#)

OSFB010

Ymateb gan: | Response from: Bwrdd Iechyd Prifysgol Aneurin Bevan | Aneurin Bevan
University Health Board

Overarching principles

Question 1: Do you agree with the overarching principles that the Bill seeks to achieve?

Yes

There is a direct correlation between the overarching principles of this Bill, and themes identified in a review of the patient dining service within the Health Board. Our internal review, which is nearing completion, has identified key priorities which supports this Bill:

- Procuring sustainable local produce
- Reducing food production and service waste
- To consider a single point of food production within the Health Board with the potential to supply other public sector organisations within the Health Board's geographical area

Supply chain issues are becoming increasingly problematic and it is hoped that this Bill would support us in addressing them.

As prices for food provisions continue to increase there should be consideration given to ensuring that controls are in place to mitigate further increases that could be experienced from a reduced procurement market

Question 2: Do you think there is a need for this legislation? Can you provide reasons for your answer.

Yes

There is most definitely a need for this legislation, particularly in terms of monitoring of food systems in Wales, and removing organisational silos to drive consistent food policies.

Food Goals

Question 3: Please provide your views on the inclusion of the Food Goals within the Bill as the means to underpin the policy objectives.

The inclusion of Food Goals helps provide a clear vision for delivery of the policies objectives.

Though descriptive, the Goals could be enhanced with the inclusion of 'quality', whether that be as a primary or secondary goal.

Question 4: Do you agree with the inclusion of a Primary Food Goal supplemented by Secondary Food Goals?

Yes

Question 5: Are there additional / different areas you think should be included in the Food Goals?

Yes. As documented in the response to Q3 there should be a focus on quality.

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?

The main area of required assurance, particularly for an organisation the size of Aneurin Bevan, would be the inclusion of clear safeguards to protect against further increases to food provision costs, particularly relating to the narrowing of the market it would have to procure from. Further to the financial concerns, a sufficient and sustainable supply of high-quality ingredients would be essential to the success of this Bill.

There would be an initial resource challenge to implement the actions within the Bill, and an ongoing resource to ensure that the Health Board dedicated sufficient time to monitor its performance against the requirements set out in the Bill.

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.

The setting of targets within the Bill is both welcomed and necessary for the reasons listed within the consultation document. It is noted that this Bill will see a 'Welsh Food Commission' established. Aneurin Bevan University Health Board would encourage an All Wales NHS group to be set up, or for this Bill to form part of an existing All Wales agenda. This is important to ensure that the Bill is considered in conjunction with existing National Standards such as the Nutrition & Hydration Standards and relevant Health & Care Standards, balancing against cost, quality and sustainability.

Question 8: Do you agree with the process for setting the targets?

Yes, but engagement with Health Boards in setting the targets is encouraged.

Question 9: Do you think the reporting mechanisms set out in the draft Bill provide sufficient accountability and scope for scrutiny?

Yes

Question 10: Do you have any additional comments on the targets, including the resource implications of the proposals and how these could be minimised?

Nothing that has not already been covered in earlier responses.

Wales Food Commission

Question 11: What are your views on the need for a Welsh Food Commission?

Agree with the need. Would like to see a member presenting NHS Wales

Question 12: Do you agree with the goals and functions of the Welsh Food Commission? If not, what changes would you suggest?

Yes

Question 13: Do you agree with the size of the membership of the Food Commission and the process for appointing its members?

Without knowing the range of representatives, it is difficult to assess whether the size is correct or not. As mentioned, a NHS Wales representative would be welcomed.

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?

Yes

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?

No

National Food Strategy

Question 16: Do you agree that there is a need for a national food strategy?

Yes

Question 17: Do you believe the Welsh Government's current strategies relating to 'food' are sufficiently joined up / coherent?

It is difficult to answer without being cited on the other documents

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?

Yes, on the proviso that either (or both) the Welsh Food Commission has a representative for NHS Wales or/and an NHS Wales sub-group is established

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?

Yes

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?

Yes

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?

No

Local Food Plans

Question 22: Do you agree that there is a need for local food plans?

Yes

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?

Yes

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?

Yes

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?

Yes

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?

No

General Provisions

Question 27: Do you agree with the list of persons defined as being a 'public body' for the purpose of this Bill?

Yes

Question 28: Do you have any views on the process for making regulations set out in the Bill?

No

Question 29: Do you have any views on the proposed commencement date for the Act?

No

General Views

Please provide any additional information relevant to the draft Bill.

On behalf of the Aneurin Bevan University Health Board I would welcome the introduction of this Bill, especially with some of the comments I have offered being considered.

As a Health Board we recognise the close links between this Bill and a review into patient dining currently taking place. We would welcome the opportunity to discuss further and perhaps be considered as an early adopter of the targets set out in the Bill.