

Economy, Trade and Rural Affairs Committee – Food (Wales) Bill

Public Health Wales' Written Response

February 2023

1 Purpose

The purpose of this submission is to provide a written response to the Economy, Trade and Rural Affairs Committee on the Food (Wales) Bill.

2 General principles

Activities within food systems have changed substantially over recent years. From how we produce, process, distribute and consume food and the impact and outcomes those activities have on food security, other socioeconomic goals and the environment. It is a complex adaptive system which is influenced by a breadth of factors including public health policy, commercial interests, climate change, emerging technologies, and consumer trends (Food Systems Group, 2022). In addition the food system impacts on food security, availability, consumption patterns and health, including associated risk factors for the development of chronic conditions.

A number of reports published by Public Health Wales in 2021 and 2022 demonstrate the complexity of the food environment and food security in the context of the pandemic, the UK's EU Withdrawal and climate change and the spatial planning system in Wales and their impact on health, wellbeing and equity and highly relevant in the context of the introduction of the Food (Wales) Bill, including:

- Rising to the Triple Challenge of Brexit,
- COVID-19 and climate change in Wales.
- Spotlight on Food Security and Maximising Health and Wellbeing opportunities for spatial planning in the COVID-19 pandemic recovery (Green et al, 2021, Green et al, 2022) and a recent one in relation to the
- Cost-of-Living crisis ([Cost of living crisis: a public health emergency - Public Health Wales \(nhs.wales\)](#) (Public Health Wales, 2022) .

The reports noted that Wales does not have its own separate, independent and explicit 'food system', but is part of an overall complex and enmeshed UK internal and international food system which is influenced by trade (Department of International Trade, 2019, 2021), production, policies, behaviours and events such as Brexit, the cost-of-living crisis or the COVID-19 pandemic.

This can present a series of 'unknown unknowns' for policy makers and health and well-being. Wales and the UK are also reliant on high levels of food imports. Therefore, a systems approach and a whole of government and multi-sector working is required.

The UN Sustainable Development Goals have clear drivers for sustainable food and health (UN, 2020, UN, 2021) and link to the Wellbeing of the Future

Generations (Wales) Act 2015 (Welsh Government, 2015). Food determinants of health including diet, nutrition, behaviour and food security are important for health, well-being and equity at both a national population level, but also at an individual and community level (Harvard School of Public Health, 2019, NIHR, 2019).

3 Food goals and targets

The food goals as described lack primacy. Good nutrition is a pre-condition for a healthy and productive life; malnutrition in all its forms imposes high economic, social and human development costs on individuals, communities and wider society (United Nations, 2023). It is advocated that adequate availability of, and access to, diverse nutritious food is the Primary Goal of the Bill. In achieving the primary function of the Bill attention should be paid to the secondary goals which also require more clarity.

School food provides a good example where the primary goal is provision of nutritious food to children and young people (Welsh Government, 2009). Secondary goals relating to the foundational economy, sustainability and creating positive relationships with food can also be achieved but not to the detriment of providing nutritious food (Welsh Government, 2013, Welsh Government, 2014).

The Public Health Wales reports (Green et al, 2021, Green et al, 2022) evidence a range of policy responses and mitigations in relation to the food environment and food security which have been taken to date. These need to be constructed in an integrated way with cross sector involvement, as actions intended to have positive impacts for one Goal, sector or area could also have negative unintended impacts for health and well-being or for other Goals and targets. This can include for the economy, employment or health and those on low incomes, lone parents. For example, a focus on sustainable local produce could be of benefit to the local economy but can drive food costs up in a setting such as a school or health care facility. Further clarity on the primacy of food goals and their descriptors could help to reduce unintended impacts.

4 National Food Strategy

Wales does not have a current national food strategy with the last version ending in 2020 (Welsh Assembly Government, 2010). One purpose of the Bill is to enhance food security and a Strategy could be a vehicle to do this. Food security is an important determinant of health and well-being at both a national population level, but also at an individual and local community level. The impacts of food insecurity on mental and physical health are well-researched with vulnerable population groups experiencing the most exposure (Elgar et al., 2021; Stuff et al., 2004). Evidence also identifies that Brexit, COVID-19, climate change and the cost-of-living crisis has impacted negatively on the food environment and food security for a wide range of population groups (The Health Foundation 2020, Green et al, 2021; Public Health Wales, 2022).

However, there are some vulnerable population groups that are particularly affected either positively or negatively or both in some circumstances. These

include those on low incomes, age related groups (i.e. children and older people), lone parents, families with children, agricultural and fishing related occupations and workers in sectors exposed to the cost of living crisis, Brexit, COVID-19 and climate change (The Food Foundation, 2019, Green et al, 2019, Marmot, 2020). These three challenges are explicit health and wellbeing drivers for better health outcomes. In addition, a range of food determinants have been impacted upon by them including individual behaviours, diet, nutrition and food cost and supply, in both a positive and negative way.

It has been noted that the fundamentals of food poverty need to be addressed first. This includes precarious employment and low wages in order to then address food insecurity and the food environment in more depth (Kaplan, 2020). For example, access to healthy food and food growing spaces was not equal across the communities of the UK before the pandemic, with those living in deprived areas more likely to experience conditions of poor environmental quality. This included limited access to open green spaces and the over concentration, and visible availability, of unhealthy food retailing. Additionally, in deprived areas poor quality high streets were, and still are, more likely to be found with less healthy food outlets and other potentially less healthy retail outlets, such as betting and gambling shops, shisha bars and shops selling alcohol (Marmot et al 2020, Public Health England, 2020a, 2020b). Both the number of food banks and the quantity of emergency food parcels distributed have increased. In February 2021, there were over 1,300 Trussell Trust food banks in the UK, in addition to over 900 independent food banks (Tyler, 2021). Independent food banks also saw a rise of 88% over the period February to October 2020 compared to the same period in 2019 (Tyler, 2021). This issue needs to be considered as part of any wider Food Strategy and any Goal setting process.

Other factors, outside the control of proposals in the Bill, limit the ability to control the food environment e.g. Town and Country Planning legislation, rise in digital food access, cost and accessibility of health food, UK legislation of food content e.g. fat, sugar and salt.

5 The Welsh Food Commission

The establishment of a Welsh Food Commission as described has a narrow remit and its time is at risk of being consumed by monitoring of Local Plans. It could be useful to think of it having a wider reach than as currently envisaged. Wales does not have its own separate food system and as noted previously is shaped by wider international, national and local policies such as trade, the economy and environmental sustainability and 'unknown unknowns' (Green et al, 2021, Faculty of Public Health 2019). The Public Health Wales report on food security (Green et al, 2021) highlights that this makes anticipating and planning action for future long-term food security and sustainability challenging in Wales. It highlights that evidence and models could be produced to support and advocate for explicit actions which will be beneficial to wider society in Wales. This needs further consideration in the wider context of the Strategy and Commission.

Evidence suggests that involving a wide range of stakeholders including health, climate change, trade and food producers / retailers to develop policy action on food determinants and food security could facilitate better health and reduce inequalities. Food security and tackling wider food issues such as siting of food

retailers, hot food takeaways, nutritional content to maximise health and well-being can only be addressed with the active engagement and support of a range of sectors including food producers and retailers in Wales (Public Health England, 2020b).

6 Local Food Plans

We recognise that there are a number of opportunities to enhance health behaviours, the food system and food security of the Welsh population in the short and long term and this includes through a proposed Food (Wales) Bill and through strategies such as 'Healthy Weight, Healthy Wales' (Welsh Government, 2020d). There is an opportunity to enable food democracy and citizenship in Wales. A 'food democracy model' could provide Welsh society with opportunities to actively participate in and contribute to, how, when and where food is grown to promote physical health and mental well-being (Petetin, 2020).

Welsh Government also has a focus on placemaking at a local level. An element of placemaking includes enabling healthier environments that support communities to access a wide range of healthier food options and adequate spaces for food growing opportunities (Welsh Government, 2020, Welsh Government, 2021). Local food production and supply chains have been crucial during the pandemic and food production in Wales remains a priority (Welsh Government, 2021) and this could be enhanced. Joint working between built environment, licensing and public health professionals to consider how to manage hot food takeaways, for example highlighting areas of high rates of obesity, proximity of takeaways to schools is essential (Public Health England, 2020b). Acknowledging the benefits of local support and contribution to achieving a National Food Strategy it is unclear of the added value of placing a duty on public bodies to create a Local Food Plan in the short term. The levers to create a system approach to food in Wales predominantly sit at a national level. There is significant ground to cover in achieving policy coherence which would act as an enabler to local areas in the future. A phased approach to implementation is advocated, with the national system being the primary focus.

During the pandemic it was highlighted that one in eight households had no access to a garden (Natural Resources Wales, 2020) , reducing the possibilities of food growing for many residents of Wales. However, many local community food growing spaces and projects continued throughout the pandemic, once social distancing and hand hygiene precautions were established. For example, Food Cardiff (Food Cardiff, 2020) distributed 14,000 plants, seeds and growing kits during the first lockdown to support Cardiff residents grow their own vegetables and supported a local network (Edible Cardiff) connecting small-scale growers, allotment holders and community gardens (Food Cardiff, 2020). However, the proportion which contributes to food security and production in Wales is tiny, contributing less than 1% (Welsh Government, 2020).

7 General

It has been reported that the public health system can act as an enabler and can assist in changing the narrative around the issue of food system security in a post pandemic world so that there is a focus on food security's and the multi systems relating to food. For example, spatial planning or trade roles in facilitating good

health and well-being and reducing inequality (Public Health Wales, 2021, Faculty of Public Health, 2019). It can also add to the evidence base around health and food systems to enable improvement and action (Shanks et al., 2021).

It has been recommended that carrying out Health Impact Assessments could strengthen policies and plans by viewing them through a social determinant and population lens in order to avoid and mitigate for unintended negative impacts which may arise in relation to food environments and food security and health and maximise any benefits (Public Health England, 2020a, Chang et al, 2020, Green et al, 2021).

Welsh Government also has commitments for, and resurgence in, local foundational economies in Wales (Welsh Government, 2021c). Food provision is a key element of a Foundational Economy and good food partnerships can enable local partners to work together to benefit health and the economy in Wales.

8 Barriers and challenges

The increased digitalisation of food, such as the transition to digital grocery and takeaway food purchasing, also increased as pandemic restrictions continued and much of the food retail system in Wales became re-localised. This was demonstrated by an increase in sales at convenience stores too which is hard to control (Chang et al, 2020).

References

Chang, M; Green, L and Cummins, S (2020) All change. Has COVID-19 transformed the way we need to plan for a healthier and more equitable food environment? URBAN DESIGN International. DOI: <https://doi.org/10.1057/s41289-020-00143-5>.

Department for International Trade (2020) UK approach to negotiating a free trade agreement with New Zealand. Available at: <https://www.gov.uk/government/publications/uk-approach-to-negotiating-a-free-trade-agreement-with-new-zealand>

Department for International Trade (2021) Trade and Agriculture Commission (TAC) – Final Report March 2021. London: UK Government. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/969045/Trade-and-Agriculture-Commission-final-report.pdf

Elgar, FJ; Pickett, W; Pförtner, TK et al. (2021) Relative food insecurity, mental health and wellbeing in 160 countries. Social Science and Medicine 268, p. 1-8. DOI: <https://doi.org/10.1016/j.socscimed.2020.113556>.

Faculty of Public Health, 2019. Negotiating a 'healthy' trade policy for the UK. Available at: <https://www.fph.org.uk/policy-campaigns/campaigns/brexit/healthy-trade-and-investment-agreements/>

Food Cardiff. (2020). Cardiff Growing Together during lockdown. [online] Available at: <https://foodcardiff.com/blog/growingtogether/>

Food Foundation (2020) New Poll Data: More than five million people in households with children have experienced food insecurity since lockdown began. Available at: https://foodfoundation.org.uk/vulnerable_groups/new-poll-data-more-than-five-million-people-in-households-with-children-have-experienced-food-insecurity-since-lockdown-began/

Food Systems Group. (2022). A Force for Change in the Food System The Environmental Change Institute University of Oxford Available at: [Food-leaflet-A5-web.pdf \(ox.ac.uk\)](https://www.eci.ox.ac.uk/food-leaflet-A5-web.pdf)

Future Generations Commissioner for Wales. (2020). The Future Generations Report 2020. Areas of Focus: Land use planning and Placemaking. [online] Available at: <https://www.futuregenerations.wales/wp-content/uploads/2020/06/Chap-5-Planning.pdf>

Future Generations Commissioner for Wales. (2021). Land use planning and placemaking. [online] Available at: https://www.futuregenerations.wales/priority_areas/planning/

Green, L; Edmonds, N; Morgan, L; Andrew, R; Ward, M, Azam, S and Bellis, MA (2019) The Public Health Implications of Brexit in Wales: A Health Impact Assessment Approach. Technical Report Part 1. Cardiff: Public Health Wales NHS Trust, Cardiff. Available at: [PHW Implications of Brexit Main Findings.pdf \(phwwhocc.co.uk\)](https://phw.nhs.uk/publications/publications1/rising-to-the-triple-challenge-of-brexit-covid-19-and-climate-change-for-health-well-being-and-equity-in-wales1/)

Green, L; Morgan, L; Azam, S; Evans, L; Parry-Williams, L; Petchey, L and Bellis, MA (2020) A Health Impact Assessment of the 'Staying at Home and Social Distancing Policy' in Wales in response to the COVID-19 pandemic. Main Report. Public Health Wales NHS Trust, Cardiff. Available at: [https://whiasu.publichealthnetwork.cymru/files/4515/9618/5918/HIA -
Rapid Review of SAH Policy Main Report.pdf](https://whiasu.publichealthnetwork.cymru/files/4515/9618/5918/HIA-_Rapid_Review_of_SAH_Policy_Main_Report.pdf)

Green et al. (2021). Rising to the Triple Challenge of Brexit, COVID-19 and climate change in Wales. Spotlight on Food Security. <https://phw.nhs.uk/publications/publications1/rising-to-the-triple-challenge-of-brexit-covid-19-and-climate-change-for-health-well-being-and-equity-in-wales1/>

Green et al. (2022) Maximising Health and Wellbeing opportunities for spatial planning in the COVID-19 pandemic recovery. [Maximising health and well-being opportunities for](https://phw.nhs.uk/publications/publications1/rising-to-the-triple-challenge-of-brexit-covid-19-and-climate-change-for-health-well-being-and-equity-in-wales1/)

[spatial planning in the COVID-19 pandemic recovery - World Health Organization Collaborating Centre On Investment for Health and Well-being \(phwwhocc.co.uk\)](#)

Natural Resources Wales. (2020). Green Recovery: Priorities for Action Report. [online] Available at: <https://cdn.cyfoethnaturiol.cymru/media/692667/final-green-recovery-priorities-for-action-report-english.pdf>

Harvard School of Public Health (2019) Poor diets linked to \$50 billion in U.S. health care costs. Available at <https://www.hsph.harvard.edu/news/hsph-in-the-news/poor-diets-health-care-costs/>

Kaplan, P (2020) Struggling for food in a time of crisis – Responsibility and paradox. Anthropology Today 36(3) p. 8-10. DOI: <https://doi.org/10.1111/1467-8322.12573>.

National Institute for Health Research (NIHR) (2020) 20/48 Food insecurity – Health impacts and mitigation. Available at: <https://www.nihr.ac.uk/documents/2048-food-insecurity-health-impacts-and-mitigation/24905>

Petetin, L (2020) The COVID-19 Crisis: An Opportunity to Integrate Food Democracy into Post-Pandemic Food Systems. European Journal of Risk Regulation 11(2) p. 1-14. DOI: <https://dx.doi.org/10.1017%2Ferr.2020.40>

Public Health Wales NHS Trust (2021) Planning and Enabling Healthy Environments: Incorporating a template for planning policy. [online] Available at: <https://phw.nhs.wales/publications/publications1/planning-and-enabling-healthy-environments-incorporating-a-template-for-planning-policy/>

Public Health Wales (2022) [Cost of living crisis: a public health emergency - Public Health Wales \(nhs.wales\)](#)

Public Health England. (2020a). Health Impact Assessment in spatial planning. A guide for local authority public health and planning teams. [online] Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/929230/HIA_in_Planning_Guide_Sept2020.pdf

Public Health England. (2020b). Using the planning system to promote healthy weight environments. Guidance and supplementary planning document template for local authority public health and planning teams. [online] Available at: [Healthy weight environments: using the planning system - GOV.UK \(www.gov.uk\)](#)

Shanks, S; van Schalkwyk, MCI; McKee, M (2020) Covid-19 exposes the UK's broken food system. The BMJ 370. DOI: <https://doi.org/10.1136/bmj.m3085>.

Stuff, JE; Casey, PH; Szeto, KL (2004) Household Food Insecurity is Associated with Adult Health Status. The Journal of Nutrition 134(9), p. 2330-2335. DOI: <https://doi.org/10.1093/jn/134.9.2330>.

Sustain (2021) Evidence – the health and wellbeing benefits of food growing. Available at <https://www.sustainweb.org/growinghealth/evidence/>

Tyler, G (2021) Food Banks in the UK – Research Briefing. House of Commons Library, UK Parliament. Available at <https://commonslibrary.parliament.uk/research-briefings/cbp-8585/>

United Nations (UN) (2020) Goal 2: Zero Hunger. United Nations Sustainable Development. Available at: <https://www.un.org/sustainabledevelopment/hunger/>

United Nations (UN) (2021) Goal 3: Ensure healthy lives and promote well-being for all at all ages. United Nations Sustainable Development. Available at: <https://www.un.org/sustainabledevelopment/health/>

United Nations (2023). Sustainable Development Goals – Nutrition. Available at: <https://www.fao.org/sustainable-development-goals/overview/fao-and-the-2030-agenda-for-sustainable-development/nutrition/en/>

Welsh Assembly Government (2010). Food for Wales, food from Wales: 2010/2020. Food Strategy for Wales. Cardiff: Welsh Assembly Government. Available at: <https://gov.wales/sites/default/files/publications/2018-05/food-strategy-for-wales-2010-to-2020.pdf>

Welsh Government (2009). Healthy Eating in Schools (Wales) Measure 2009. Available at: <https://www.legislation.gov.uk/mwa/2009/3/contents>

Welsh Government. (2013). The Healthy Eating in Schools (Nutritional Standards and Requirements) (Wales) Regulations 2013. Available at <https://www.legislation.gov.uk/wsi/2013/1984/contents/made> heart 1The Healthy Eating in Schools (Nutritional Standards and Requirements) (Wales) Regulations 2013

Welsh Government (2014). Healthy eating in maintained schools; Statutory guidance for local authorities and governing bodies. Available at: <https://gov.wales/sites/default/files/publications/2018-12/healthy-eating-in-maintained-schools-statutory-guidance-for-local-authorities-and-governing-bodies.pdf>Welsh Government. (2020). Building Better Places. The Planning System Delivering Resilient and Brighter Futures. Placemaking and the Covid-19 recovery. [Online] Available at: <https://gov.wales/sites/default/files/publications/2020-07/building-better-places-the-planning-system-delivering-resilient-and-brighter-futures.pdf>

Welsh Government. (2015). Well-being of future generations (wales) act. Available at: <https://www.legislation.gov.uk/anaw/2015/2/contents/enacted>

Welsh Government. (2021a). Future Wales. The National Plan 2040. [online] Available at: <https://gov.wales/sites/default/files/publications/2021-02/future-wales-the-national-plan-2040.pdf>

Welsh Government. (2021b). Planning Policy Wales. Edition 11. [online] Available at: <https://gov.wales/sites/default/files/publications/2021-02/planning-policy-wales-edition-11-0.pdf>

Welsh Government (2021c) Written Statement: Foundational Delivery Plan. Welsh Government. Available at <https://gov.wales/written-statement-foundational-delivery-plan>

Welsh Government (2021d). Health Weight: Healthy Wales obesity strategy. Available at: <https://gov.wales/health-weight-healthy-wales-obesity-strategy>