

## Healthy Weight: Healthy Wales

### Consultation scorecard

#### About the Obesity Alliance Cymru

Obesity Alliance Cymru (OAC) is a group of leading charities and health organisations\*, who have come together to influence and support the development of an obesity strategy for Wales, as detailed by the Public Health (Wales) Act 2017. The Co-Chairs of the OAC are Gethin Matthews-Jones, Royal College of Paediatrics and Child Health; and Andy Glyde, Cancer Research UK.

#### Introduction

Almost 60% of adults<sup>1</sup> and 27% of children<sup>2</sup> in Wales are overweight or obese. Wales has the highest proportion of overweight and obese 4-5 year olds in Great Britain.<sup>3</sup> Obesity is the leading cause of major health conditions including Type 2 diabetes, stroke, cardiovascular disease and a number of cancers<sup>4</sup>. Health organisations including professional bodies and third sector campaign groups along with clinicians and researchers have long argued that reducing and preventing obesity would be a game-changer in improving our nation's health. It is therefore welcome that the Public Health (Wales) Act 2017 commits the Welsh Government to publishing a strategy to prevent and reduce obesity in Wales. The launch of the consultation for a Healthy Weight: Healthy Wales strategy in January 2019 was an important step in delivering this.

This document presents a scorecard for the consultation document against the policy calls the OAC made in December 2017 for inclusion in an obesity strategy for Wales.<sup>5</sup> It highlights where we feel good progress has been made, and where further action and detail is required.

Overall, we are pleased to see that a number of our recommendations have been included in the consultation document, including action on marketing and promotion of food and drink high in fat, sugar, and salt (HFSS); the food environment in hospitals and other public spaces, improved data gathering, and renewed leadership to drive this agenda.

However, we feel that there are sections of the consultation document which do not go far enough; in particular, on providing resource for the obesity pathway, so that people who are overweight or obese are able to access appropriate support and treatment.

We also have some concern about the lack of detail for some proposals, the language used, and the pace of change. The consultation was launched 18 months after the Public Health (Wales) Act became law, and it is clear that some measures could take years to be introduced, if included in the final strategy. Whilst we recognise that Healthy Weight: Healthy Wales is a long-term strategy, Wales cannot afford to fall behind other UK nations who are moving at a swifter pace, especially given the scale of the challenge Wales is facing.

Finally, we call on the Welsh Government to be clear about its ambition. Setting clear and meaningful targets would allow for progress to be measured. For children, obesity rates must decrease. Anything less would be a failure.

Healthy Weight: Healthy Wales is an opportunity to improve and extend lives across Wales. We now need ambition, determination, courage, investment and a focus on delivery to take forward the strongest possible version of these proposals.

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\* The full list of members of the Obesity Alliance Cymru are British Dietetic Association, British Medical Association, Cancer Research UK, Chartered Society of Physiotherapy, Diabetes UK, Nutrition Skills for Life, Royal College of Nursing, Royal College of Paediatrics and Child Health, Royal College of Physicians, Royal College of Psychiatrists, Royal College of Surgeons, Royal College of Surgeons of Edinburgh, Tenovus Cancer Care, and Welsh NHS Confederation.

## Obesity Alliance Cymru's calls and the Healthy Weight: Healthy Wales consultation

### Key:

- **Green** Our call for the strategy has been met in full by the consultation document
- **Amber** Our call has been met in part and we would like to see further detail
- **Red** Our call has not been met and we are calling for inclusion in the final strategy

OAC Call	Score	Comments
Review rules covering sponsorship of sports and family attractions in Wales and marketing communications in schools, hospitals, leisure centres and other publicly owned or managed spaces in Wales. In addition, Welsh Government should urge the UK Government to close existing loopholes to restrict children's exposure to HFSS food marketing across all media, including broadcast and social media.	Green	<p>Welsh Government have committed to limit advertising and promotion of unhealthy food in public places. This includes, but is not limited to, train and bus stations/bus stops/on buses and at sporting and other events. [HE2]</p> <p>We would be keen to see further consideration given to sponsorship of sports and other events in Wales.</p>
Monitor and evaluate the impact of the Soft Drinks Industry Levy on consumption of sugar sweetened beverages (SSBs) in Wales and take action to reduce the consumption of SSBs. Any revenue raised through the levy should be redirected to programmes that tackle childhood obesity	Amber	<p>Welsh Government to support Welsh businesses to reformulate and to develop healthier food choices. [HE1]</p> <p>A consultation on a ban on energy drinks to children under 16 and to consider restrictions on free refills and max portions for soft drinks. [HE5]</p> <p>However, we would like to see a commitment to use funds from the Soft Drink Industry Levy to support efforts to prevent childhood obesity.</p>
Expand the Child Measurement Programme for Wales beyond the current 4-5 year olds, for example to year four, as previously piloted. This will provide evidence against which to evaluate the success of interventions designed to tackle childhood obesity.	Green	<p>A commitment to review data from the Child Measurement Programme, including to develop a 'second measurement', which is welcome. [LEC1]</p> <p>We would like to see further detail on which age a second measurement would be introduced.</p> <p>There should also be services and support that families can be signposted to following participation in the CMP.</p>
Explore options and take action to make healthier choices in the retail and out-of-home environments easier, including exploring a potential curb on promotional positioning (e.g. at checkouts) and pricing (e.g. buy one get one free) of HFSS and increase promotion of healthier affordable choices.	Green	<p>A commitment to regulating price promotion and discounted practices that lead to high consumption of unhealthy foods. [HE3]</p> <p>We would like to see further consideration given to location-based promotions.</p>
Gather evidence on how nutritional labelling is most effective in the out-of-home sector with a view to empowering consumers to make healthier choices.	Green	<p>A consultation on mandating calorie labelling for food purchased and eaten outside of the home. [HE4]</p> <p>We would like to see further detail on how and when this would be introduced, including how it would align with similar action being taken in other UK nations.</p>

<p>Lobby the UK Government to strengthen traffic light front-of-pack nutrition labelling as part of negotiations to leave the European Union and any future trade deal agreements, seeking clarification on potential devolved powers in this area following the UK's withdrawal from the European Union.</p>	<p>Amber</p>	<p>The document suggests consideration of further opportunities to improve consumer information on labelling which may arise following European Exit, including on front of pack nutrition labelling. [HE4]</p> <p>However, we are concerned that the language used is quite woolly and we would like to see a stronger commitment to address this with repatriated powers following Brexit.</p>
<p>Provide local authorities with the resources needed to take action on obesity. This should include increased and continued investment in public health, active travel and promoting cooking skills in communities.</p>	<p>Amber</p>	<p>A strengthened role for public health leaders in local health boards, including making obesity a tier 1 target. Aim to prioritise and focus existing resources. [LEC1]</p> <p>However, there is no suggestion of additional investment in public health, which will be essential to delivering any change in obesity rates in Wales.</p>
<p>Work with local authorities and communities to respond to obesity challenges through licensing, planning and shaping the local environment.</p>	<p>Amber</p>	<p>A commitment to work with local authorities, health boards, Public Health Wales and Transport for Wales to create environments that facilitate active travel, physical activity, access to healthier food, high quality open spaces, green infrastructure and opportunities for play, sport and recreation, are prioritised as part of the planning process. [HE6]</p> <p>We would like to see specific action on restricting new hot food takeaways near schools, given evidence from the UK and internationally showing that this can have an effect on childhood obesity rates.<sup>6</sup></p>
<p>Review guidance for leisure centres and other local authority premises around the sale of SSBs and HFSS foods from shops, cafes and vending machines.</p>	<p>Green</p>	<p>A commitment to promoting healthy food and drink options in wider public health settings. [HS6]</p> <p>We would like to see further detail, particularly on how public sector procurement can be a driver for change in this space.</p>
<p>Support Public Services Boards to create communities and spaces that will encourage and enhance healthy environments in keeping with the requirements set out in the Well-being of Future Generations (Wales) Act 2015. This should include a collaborative approach in relation to transport arrangements (as required within the Active Travel (Wales) Act 2013), the use of Health Impact Assessments and best practice examples.</p>	<p>Green</p>	<p>The document commits to work with local authorities, local health boards, Transport for Wales and partners to ensure that key infrastructure investments in our towns and cities are connected and support the development of healthier weights. [HE7]</p>
<p>Ensure schools implement the Healthy Eating in Schools regulations and have the facilities, resources and funding to help every child learn to cook healthy meals.</p>	<p>Green</p>	<p>The consultation suggests plans to help schools, colleges and childcare settings to be healthy weight environments. It also includes a promise to develop a new curriculum to include healthy eating and cooking. [HS1; HS2; HS4]</p>
<p>Ensure that all food served, sold and promoted to staff and visitors on hospital sites promote a</p>	<p>Amber</p>	<p>Local health boards and trusts to act as an exemplar and support their workforces to be healthy and active</p>

<p>healthy balanced diet in line with the Eatwell Guide. This should include shops, cafes and vending machines in hospitals. Welsh Government should ensure that hospitals are appropriately funded to serve healthy, nutritious food to support patients to maintain a healthy diet and weight.</p>		<p>workforces. It also includes the development of a national Hospital Retail Standard. [HS5]</p> <p>We would like to see how a new retail standard would be implemented, including whether it would capture all shops, cafes and vending machines in hospitals.</p>
<p>Encourage a holistic approach to healthcare by delivering core skills training to all health and social care professionals to support those who are obese or overweight.</p>	Amber	<p>Inclusion of strengthening opportunities to develop and reinforce the knowledge and skills of staff working across a range of roles [HP2], and ensuring professionals have appropriate skills and consistent resources to hold positive conversations about healthy weight. [HP3]</p> <p>However, both of these points are vague and it is not clear how these would be delivered effectively.</p>
<p>Support the wider roll out of existing healthy eating initiatives such as those supported by the all-Wales Nutrition Skills for Life™ programme.</p>	Amber	<p>The consultation suggests the roll-out of high impact behaviour change programmes. [HP1]</p> <p>We are disappointed not to see a specific commitment to the successful Nutrition Skills for Life programme. We would also like to see further detail on funding for such programmes, and how they would be evaluated.</p>
<p>Work with stakeholders including Health Education and Improvement Wales (HEIW) to develop and promote evidence-based training for all health and social care professionals supporting people to live well for life. This should include a range of training opportunities, such as early identification of overweight and obese individuals, motivational interviewing, Making Every Contact Count, supporting people with mental health conditions to maintain a healthy weight and signposting to other local services</p>	Green	<p>We welcome further training for relevant front-line staff in MECC [HP2], and that the role of mental health and the need for specialist services to support this is recognised. [HP5]</p>
<p>Commit to increased and continued investment in services to ensure that people are able to access services appropriate to their needs. This should be supported by a requirement that all Health Boards identify strategic leadership and resources to:</p> <ul style="list-style-type: none"> <li>• Implement the All Wales Obesity Pathway for adults ensuring services are delivered across all levels of the pathway</li> <li>• Implement the All Wales Obesity Pathway for children to include access to medical, dietetic and psychological support, in addition to services at lower levels of the pathway.</li> </ul>	Red	<p>We are disappointed and concerned that the consultation document only commits to a review of the All Wales Obesity Pathway [HP5].</p> <p>This pathway has been in place for almost 10 years. However, it has not been rolled out in full across Wales, largely due to inadequate resources. It is most concerning that very few services are in place to support overweight and obese children.</p> <p>Access to treatment for overweight and obesity should be part of the suite of measures for Wales to reduce obesity rates. However, the consultation document does not give this area enough attention and, as a result, there is a significant risk that the pathway, or a renewed version of it, may not be in place for a</p>

		number of years. This must be urgently addressed by the final Healthy Weight: Healthy Wales Strategy.
Urgently review and identify gaps in service and co-ordinate the establishment of all levels of services in all areas of Wales.	Red	As above
Publish data on obesity rates to ensure transparency, measure progress and inform future policy.	Green	We are pleased that a minimum national obesity dataset to help monitor impact will be established by working with Local Health Boards. [HP5]  We would like to see further detail on which metrics might be included in the dataset, whether this data is currently available and, if not, how gaps in data will be addressed.

## References

<sup>1</sup> Welsh Government, National Survey for Wales 2017-2018, Population Health – Lifestyle,

<https://gov.wales/docs/statistics/2018/180627-national-survey-2017-18-population-health-lifestyle-en.pdf>

<sup>2</sup> Welsh Government, Child Measurement Programme 2017-2018,

<http://www.wales.nhs.uk/sitesplus/documents/888/CMP%20report%20%28Eng%29.pdf>

<sup>3</sup> Cancer Research UK, Obesity in Wales, April 2018,

<sup>4</sup> Welsh Government, Healthy Weight: Healthy Wales, consultation document, January 2019,

[https://beta.gov.wales/sites/default/files/consultations/2019-01/consultation-document\\_0.pdf](https://beta.gov.wales/sites/default/files/consultations/2019-01/consultation-document_0.pdf)

<sup>5</sup> The full list of the Obesity Alliance Cymru's policy calls for a strategy on obesity can be found at

[https://www.bda.uk.com/professional/influencing/obesity\\_alliance\\_cymru\\_headline\\_calls.pdf](https://www.bda.uk.com/professional/influencing/obesity_alliance_cymru_headline_calls.pdf).

<sup>6</sup> Scottish Government (2018) Research project: To explore the relationship between the food environment and the planning system ([pdf](#)); Smith, D. Cummins, S. Clark, C. Stansfield, S. (2013) "Does the local food environment around schools affect diet? Longitudinal associations in adolescents attending secondary schools in East London" *BMC Public Health* 2013 13:70 ([pdf](#)); Davis, B. Carpenter, C. (2009) "Proximity of Fast-Food Restaurants to Schools and Adolescent Obesity" *Am J Public Health*. 2009 March; 99(3): 505–510. ([pdf](#)); Forsyth, A. Wall, M, Larson, N. Story, M. Neumark-Sztainer, D. (2012) "Do Adolescents Who Live or Go to School Near Fast Food Restaurants Eat More Frequently From Fast Food Restaurants?" *Health Place*. 2012 November; 18(6): 1261–1269. ([pdf](#)); Virtanen, M. Kivimäki, H. Ervasti, J. Oksanen, T. Pentti, J. Kouvonen, A. Halonen, J.I. Kivimäki, M. Vahtera, J. (2015) "Fast-food outlets and grocery stores near school and adolescents' eating habits and overweight in Finland". *European Journal of Public Health*, Volume 25, Issue 4, 1 August 2015, Pages 650–655 ([pdf](#))