

Cyflwynwyd yr ymateb i ymgynghoriad y [Pwyllgor Iechyd a Gofal Cymdeithasol](#) ar [Atal iechyd gwael - gordewdra](#)

This response was submitted to the [Health and Social Care Committee](#) consultation on [Prevention of ill health - obesity](#)

**OB04 : Ymateb gan: Swyddfa Comisiynydd Cenedlaethau'r Dyfodol |  
Response from: Office of the Future Generations Commissioner**

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By email

03/06/2024

Dear Chair,

I thank you for the opportunity to provide evidence to the committee.

I welcome the Committee's timely inquiry into the '*Prevention of ill health – obesity*' as obesity continues to grow at an alarming rate in Wales. This is not unique to Wales, and it is growing phenomenon in most industrial nations.

- In 2023, the [Chief Medical Officer \(CMO\) for Wales](#) reported that nearly one in three children in Wales are overweight or obese by the time they start primary school.
- [This year, Nesta](#) found that a third of Welsh adults are obese, which may make Wales the most obese nation within the UK.
- [Public Health Wales](#) estimates that the cost of obesity to the NHS in Wales could reach £465 million a year by 2050, with the wider costs to the Welsh economy rising to £2.4 billion.
- Diabetes UK just reported that, in Wales, the number of cases of people under 40 living with type 2 diabetes has risen by 22% to nearly 7,000 over the same period. The report notes concerns that children in the most deprived areas are more than five times more likely to develop type 2 diabetes in the least deprived areas.

Wales needs a long-term and integrated plan to reduce obesity, aligned to the Well-being of Future Generations Act, to address this in the long-term.

Good health, and equality of health outcomes for people in Wales, is at the heart of the Well-being of Future Generations Act. Preventing ill health, including obesity, is critical to achieving all seven of Wales' Well-being Goals, including:

- A healthier Wales: A society in which people's physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood.
- A more equal Wales: A society that enables people to fulfil their potential no matter what their background or circumstances (including their socio-economic background and circumstances).

**In support of the committee's inquiry, I have framed my evidence around the Well-being of Future Generations Act, as follows:**

- My commitment as the Future Generations Commissioner to support action to reduce obesity through my Cymru Can strategy

- Findings of a Live Lab my office took part into in 2019, which recommendations are still directly relevant to this consultation. I also attach an interim report for the Committee to consider.
- Findings from my team's analysis of how obesity is currently being referenced within the statutory well-being plans of public bodies
- Findings from the Welsh Government's Well-being of Wales report related to obesity
- Recommendations of how to utilise the five ways of working to address obesity in Wales
- Further considerations based on the discussions my team and I have had with the public sector and other partners around obesity

## 1. Cymru Can

Within my [Cymru Can strategy for my term as Commissioner](#), I have outlined Health and Well-being as one of our missions to be delivered under my term as Commissioner.

Alongside trends such as an aging population and poor mental health, we are placing significant focus on prevention of poor health outcomes and inequality of outcomes, and recognising more action needs to be taken to reduce health inequalities in Wales: there is a difference of 13 years healthy life expectancy between the most and least deprived areas in Wales. We are advocating that public bodies act, so that we see:

- The Social Model of Health integrated within the work that public bodies do
- A shift in budgets and planning towards prevention
- More collaboration and integration between the NHS, social care, and other relevant organisations, such as on sharing data, budgets, plans and campaigns
- A more diverse range of people involved in shaping and co-producing services.

Within Cymru Can we also outlined 'food' as our first **Focus Area**, due to the way it aligns to, and can deliver against, each of our missions (health, climate and nature, culture and Welsh language, and a well-being economy).

- Advocate for Welsh Government to develop a long-term food strategy framed by the Well-being of Future Generations Act
- Work with public bodies and Public Service Boards to integrate sustainable food policies within their well-being plans, including developing community food plans.

Our health mission and food focus will provide advice to public bodies as they develop their well-being objectives and plans under the Well-being of Future Generations Act – and I will ensure recommendations to address obesity are incorporated in the advice I provide to the public sector during my term – including in my Future Generations 2025 Report.

## 2. Findings of the Betsi Cadwaladr University Health Board and Future Generations Commissioner Live Lab on Preventing and tackling obesity 2018-19

In February 2019, our joint Live Lab produced an interim report containing the following Recommendations for action, which we believe are still relevant today. It also contained recommendations at the regional and local level to address the striking findings of the group summarised in the graphic below:

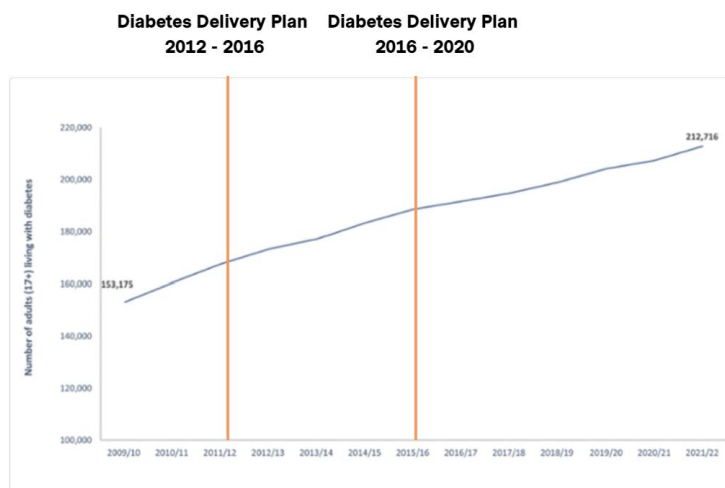


Figure 4: the number of adults (17+) living with diabetes in Wales increased by nearly 60,000 people between 2009/10 and 2021/22. This is an increase of almost 40%. QOF, 2018/19 and QAIF, 2021/22, Welsh Government

Source: Graph from PHW available here: <https://phw.nhs.wales/services-and-teams/observatory/data-and-analysis/diabetes-prevalence-trends-risk-factors-and-10-year-projection/> We added the orange lines to show when the diabetes Delivery Plans were adopted.

The report proposed the following actions for consideration at a national level in Wales:

- Ensure that the [new] national curriculum [now adopted] incorporates aspects of health living including:
  - ensuring each child at secondary school can shop for basic ingredients and then carry out basic cooking and measuring tasks and prepare and cook a range of simple, quick, cheap meals from those ingredients with appropriate portion control
  - at least half an hour of vigorous exercise of any kind incorporated into each school day for every child at all ages. This need not be a traditional “PE class” approach but could include exercise within other classes and play time.
  - key messages about what is a healthy weight, what amount of exercise is health and the dangers of being overweight or obese
- Provide better national information and more readily useable (eg through palm size guides or mobile phone apps) about:
  - portion sizes for fruit and vegetables to achieve five portions per day



- daily recommended calories and portion sizes particularly of carbohydrates, sugars and fats to achieve this including examples
- hidden sugars and the impact of sugar substitutes
- the meaning of best before dates
- development milestones and parental hints and tips and you tube links
- Review the Welsh Network of Healthy Schools Schemes to be more specific about requiring half an hour of vigorous exercise per day and lessons on how to shop, prepare food, cook it and understand portion control
- Redefine how a “good school” is assessed so that we feed bodies as well as minds and school assessment incorporates a review of the school approach to healthy living for their pupils to include exercise requirements, cooking and healthy diet and the use of play time for healthy exercise.
- Develop teaching materials which support teachers to introduce diet and vigorous exercise into other curriculum topics
- Introduce a more intensive programme of monitoring weight of children at school at different ages linked to supportive intervention where children are overweight.
- Review planning guidance on permission for fast food outlets close to schools
- Review and consider adopting at a national level the recommendations of the report from the British Psychological Society (Understanding obesity: The psychological dimensions of a public health crisis, the British Psychological Society, 2018) and explore a more psychologically informed approach to understanding our relationship with food and comfort and to our programmes for preventing and tackling obesity and consider adopting a similar approach to that taken with Adverse Childhood Experiences.
- Review and decide what action to take on the recommendations from the 2011 report of the National NHS Obesity Observatory particularly the recommendation that we identify a stronger link between mental health and obesity and that care providers should monitor the weight of all depressive patients and the mood of all obese patients
- Develop and launch a national campaign to prevent and tackle obesity linked to regional and local campaigns in a coordinated approach across all public service boards in Wales with consistent, high profile leadership at all levels.
- Review the evaluation of the “Appetite for Life” resource <http://www.wales.nhs.uk/news/12823> and consider whether to refresh and relaunch
- Consider a “Foodwise in Pregnancy programme to promote healthy living messages to those who are pregnant or are considering getting pregnant and provide advice on health living when prescribing contraceptives
- Consider how a similar network to the Welsh Healthy Schools Network could be developed for FE and HE institutions

- Consider more active public leadership on the promotion of breastfeeding to support the national action plan including celebrity endorsement and that there is a clear understanding of any links between breast feeding and parental attitudes to food, nurture and attachment or commission research to gain that understanding
- Review the Corporate health standard to build in more specific requirements about health living and vigorous exercise
- Consider building the five ways to well-being into the Corporate Health standard and developing it into more of a Well-being standard for employers.
- Consider a campaign targeted at producers and suppliers around healthy food and the consequences of unhealthy food similar to that used to tackle tobacco and smoking.
- Review the actions being taken in localities in Scotland to promote the local food economy such as Nourish Scotland and eatbetterfeelbetter.co.uk and consider adopting and supporting a similar programme within Wales.
- Promote a sustainable approach to procurement of food throughout public services where locally produced fresh produce, cost to the consumer, healthy menus, good consumer information and appropriate portion sizes are given added weight so that all public services are adopting a "healthy living approach" to all their food procurement.
- Develop and promote clear guidelines for public service partners in Wales on language and imagery to support a campaign to prevent and tackle obesity which does not stigmatise and is non judgemental.

The Committee may wish to explore with Welsh Government and key national partners the implementation of these recommendations.

The Live Lab as also shown how we can involve further the public, voluntary, community or business sector in public health issues and healthy living as required by the Well-being Act.

From local residents, the Live Lab heard that the challenges individual face to adopting health living approaches include:

- Time pressures particularly for parents who are working
- The difficulty of accessing information which is easy to understand and not confusing so that people don't know what is right and wrong about exercise and eating
- Safety especially lighting of roads, walkways and sports areas but recognising that open space is an asset
- Self confidence, motivation, eating in response to stress and managing children's behaviour; easier to give them what they want
- Having someone to exercise with and no provision for families to exercise together
- Cost of activities eg gyms
- Transport and lack of appropriate facilities particularly for people with disabilities

- Sleep and stimulants and relying on stimulants
- Screen time and phones distract people from exercise and adverts encourage unhealthy choices
- Need to see people leading by example making good choices. Needs to be less temptation through adverts.

It is important to increase involvement of population and move towards more co-design approaches in identifying and designing the solutions that will truly curb these worrying trends.

### **3. Analysis of the integration of health and obesity in the statutory well-being plans of public bodies**

Under the Well-being of Future Generations Act, public bodies (including Local Authorities and Health Boards) must set well-being objectives and steps, which maximise their contribution to the seven well-being goals. My office has conducted an analysis of public body well-being plans and the extent to which they have integrated ambitions on health and prevention by comparing a 'snapshot' of what they were in 2018/19 in comparison to 2022/23.

Overall, almost all public bodies had objectives or steps relating to health in both time frames, and this prevalence remains constant in both time frames. Going further, we looked at *what* Public Bodies are discussing in relation to health in their plans. **There is low consideration of obesity and overweight within well-being plans in both time frames:** in 2018/19 there was one objective and three steps that mentions obesity, whereas in 2023, there were no objectives, and just one step. Meanwhile, there is a slight increase in consideration of 'physical health' and 'fitness', going from 20 to 26 mentions in well-being steps within the timeframe. Recent examples include:

- "Promote healthier lives and increased physical activity through MonLife sports and leisure facilities and promote access to open spaces for outdoor exercise" (Monmouthshire County Council)
- "Ensure everyone has the opportunity and capability to be physically active every day" (Ceredigion County Council)
- "Ensuring children have the opportunity to access meaningful community sports programmes" (Flintshire County Council)

There are some key words, however, that have no mentions within the well-being plans in either timeframe – these include 'diet', 'fruit' and 'vegetable'. This suggests that ambitions in these plans around improving health, are not necessarily being linked to meaningful steps on improving healthy diet.

Public bodies are, however, setting ambitions on reducing poverty levels (which is one of the key factors in determining the health outcomes) – with an increased number of mentions of this (e.g. deprived / deprivation, vulnerability, poverty, inequality) in 67 steps in 2023 than 75 in 2018/19. Some examples include:

- “Reduce the impacts felt by people in poverty and utilise UK and Welsh government mitigations in response to increasing costs of living.” (Ynys Mon Council)
- “Prevent the impacts of poverty and material deprivation from getting worse by providing good quality local employment opportunities and supporting a thriving and resilient Blaenau Gwent” (Blaenau Gwent Council)
- “Engaging, supporting and referring vulnerable households to reduce fuel poverty and improve health and wellbeing” (Flintshire Council)

We know that there is work being undertaken by public bodies that aren't necessarily captured in the Well-being Objectives and Steps (such as Carmarthenshire Council's work on a Future Generations School Menu), but this analysis provides a useful indicator of how health and prevention is being considered by public bodies.

Overall, we would like to see action from Welsh Government to help public bodies to continue to raise ambitions on reducing obesity and for example providing opportunities for people to partake in physical activity – be that active travel routes, access to sport or leisure, or developing more green spaces. In addition, we believe it would be beneficial if public bodies had greater recognition of the role that diet has in health outcomes such as preventing obesity and related mental health conditions.

#### 4. The Well-being of Wales Report 2023

Each year the Welsh Government assesses progress on the fifty well-being indicators used to measure progress in achieving Wales' well-being goals. I would also encourage the committee to reflect on the supplementary [Ethnicity and Well-being Report](#) to identify how health inequalities intersect with other forms of inequality and discrimination.

The national indicators with most relevance to this consultation are

- the 'percentage of adults with two or more healthy behaviours' the national milestone is for adults is to achieve more than 97% by 2050
- the 'percentage of children with two or more healthy behaviours', with national milestones for 94% to children to achieve this by 2035 and more than 99% by 2050.

Healthy behaviours for adults are: eating five or more portions of fruit or vegetables the previous day; being active for 150 minutes or more the previous week; being a healthy weight; not currently smoking; drinking within weekly guidelines. They are amended for children and young people: exercising every day, eating fruit and vegetables every day, non-smoker, and never or rarely drinking alcohol.

The latest edition of the Well-being of Wales Report notes that 92% of adults reported following two or more of the healthy lifestyle behaviours, with no significant change from the previous year. The lowest reported behaviours were: 29% ate five or more portions of fruit or vegetables a day, and 37% reported being a healthy weight. Just over half of respondents (55%) said they had been active for 150 minutes or more the previous week.

Among children and young people, 90% of young people (11-16) reported two or more healthy behaviours. Of these, the two lowest reported were: eating fruit or vegetables every day (45%), and being physically active for an hour or more per day over the last seven days (16%). Importantly, the report notes that discrepancies occur when considering deprivation young people from lower affluence groups are less likely to report healthy behaviours.

Given among both age groups, 'eating fruit and vegetables' were among the two lowest reported, it suggests action is needed within this area to help reach the milestone, and additionally help prevent poor health outcomes.

The next Well-being of Wales report is due to be published in autumn 2024, and we recommend that the Committee takes note of its findings when developing policy proposals.

StasWales also shows by [local authority area](#), rates of body weight classified as overweight and obese which range from 52% in Powys to 78% in Blaenau Gwent (where 37% of adults reported being obese).

## **5. Addressing obesity through the five ways of working**

The Well-being of Future Generations Act sets out **five ways of working** which public bodies should follow. These are most effective when utilised collectively. While the work on obesity is largely focussing on *prevention*, progress will only be achieved when all these elements are considered. For example Welsh Government and public bodies should:

- Consider how people living with overweight or obesity, those at risk (e.g. most deprived communities), and people from all protected characteristics, can be more effectively **involved** in public health approaches. For example, by exploring how parents/guardians and children can be [involved in the development of school menus](#).
- Consider how **long-term** trends are interacting with other trends. This may include how climate change will affect the provision of healthy food in our supermarkets as extreme weather events are affecting food production both at home and abroad.
- We are facing challenging and complex times in Wales, with our healthcare services, wider public sector, and third sector under unprecedented strain. This makes it harder, but also more important than ever, to balance managing the crises of today with **preventing** the crises of the future. There are [tools that can help us do that](#) and inspire us, but the most important lever for change is shifting people's mindsets and behaviours from only focussing on the present to also considering the **future**.
- In order to **prevent** obesity, public health approaches must look at root causes such as poverty, wider determinants of health, inequality, and systemic barriers to good diet and exercise. We need to move away from acute spending and simply managing the symptoms of ill health and turn our focus to [primary prevention](#) – creating the conditions, in which problems do not arise in the future.
- Given the complex nature of the causes of obesity we need to **integrate** policy and actions to ensure goals are working together – for example, looking at how this relates to efforts on

green space access, active travel, sustainable land management (including farming), and economic prosperity.

- Finally, good **collaboration** between all sectors and stakeholders is necessary as public health is a deep and complex system that touches on all aspects of public service delivery. Public Service Boards can act as a focal point for this collaboration – many of them have objectives specifically relating to health and prevention.

## **6. Considerations for the committee**

We are currently in the process of drafting our upcoming **Future Generations Report** which will be published in 2025. Nevertheless, it is worthwhile noting the recommendations in the previous report, which included an emphasis on health inequalities. Our recommendations in the 2020 Future Generations Report, for Welsh Government, relevant to this inquiry were:

- Use the wider determinants of health to enable a whole-system approach for improving health and wellness.
- Change funding arrangements across sectors and services to encourage collaboration to keep people well and reduce demand – using increased investment in preventative activities as a first step.
- Change performance management arrangements with public bodies to encourage collaboration to keep people well and reduce demand.
- Explore new approaches to investment in prevention, including whether funds raised from new taxes (such as the potential social care levy) could be used for investment in prevention.
- Appoint a Minister for Prevention with responsibility for taking a whole-government, coherent and evidence-based approach to investment in prevention.

In my position as Future Generations Commissioner for Wales, I have had the opportunity to engage with many discussions on the topic of health prevention with key stakeholders working in this space – from chief executives of health-boards, through to community growers looking to improve school menus. These opportunities have included our consultation and engagement work to develop Cymru Can, and our recent food event at the Senedd (April 2024).

Based on these discussions and research undertaken by our office, I encourage the Committee to consider the following:

1. The Committee should consider how **the Welsh Government should create a national food strategy for Wales.**

We need systems thinking around the wider determinants of health, food being one of them. This strategy should set a long-term vision and strategic direction for food policy in Wales which integrates food policies across Welsh Government portfolios. A national food strategy would demonstrate the join up of food policies from the sustainable farming scheme, support provided to the food and drinks industry through to procurement and plans to reduce obesity and improve nutrition. Wales will not be able to reduce obesity through the health system alone. For example,



improving the consumption of fruit and vegetables will require a holistic approach from agricultural policy through to support for Welsh food businesses and to community supported agriculture.

Education on healthy diet and exercise guidelines could form part of a public health campaign, but it alone is insufficient to tackle the root causes of health inequality within Wales as **the wider determinants of health are key. The environments offered to people and the conditions and opportunities given to them are a main driver:**

- a. There will always be some people who, for accessibility reasons, will always rely on processed meals – the diversity of need should be recognised within Wales and efforts taken to ensure healthier affordable options are available to all.
  - b. Poverty remains a driving factor that limits access to healthy food. As the cost-of-living crisis intensifies, this should be recognised. While some raw (healthy) ingredients may be cheap, many families cannot afford [the electricity or fuel required to cook meals from scratch](#).
  - c. Improving the prosperity of rural economies via sustainable food businesses, could help alleviate economic disadvantage in some areas.
  - d. National goals on nature, health and rural prosperity would help all sectors collaborate towards a common vision – the current approach of focussing on trade outputs separately from the production of healthy nutritious food, can lead to conflicting approaches within the sector, and confusion among public bodies about where they should be placing their efforts and resources.
  - e. Mental health benefits – there is a growing body of evidence around the role that a healthy diet has on mental well-being. Recent research has pointed to, for example, the negative impact of [ultra-processed foods](#), and [diets high in sugar](#), on mental health, alongside the important role of our [microbiome](#).
2. **Involve and co-produce decisions with people from marginalised backgrounds.** Health inequalities remain a particular issue for the Gypsies, Roma and Traveller communities. According to the Well-being of Wales Report 2023, *'Children from a White Gypsy or Traveller ethnic group were the least likely to meet the national indicator of two or more healthy behaviours (66%) compared to all other ethnic groups... Young people from an Indian ethnic group reported the highest rates of satisfaction with their life compared to those from a White Gypsy or Traveller ethnic group who reported the lowest.'*
3. The Committee should consider how **long-term trends** relating to poor health and obesity are impacting on, and being impacted, by other long-term megatrends. For example, Welsh Government's Future Trends Report tells us that:  
Changes to our food systems and increased food demand can, while reducing global levels of hunger and malnutrition, also lead to growth reduce in agricultural emissions, food waste, and obesity.



- Other trends such as ageing population, changes to our working lives and increasing strain on our health systems will also impact and be impacted by obesity.
  - Climate change will also affect the accessibility and price of food.
4. Advice and guidance to public bodies on how they can shift their efforts towards **prevention** in their well-being objectives would help raise aspiration and therefore their activity on these issues. From our engagement with public bodies, we know that there are pockets of ambitious activities across Wales, but it is not consistent. This could include:
- a. Planning – to ensure the (disproportionate) prevalence of fast-food outlets in deprived areas is not increased, while also supporting more equal access to affordable, healthy options.
  - b. Supporting and engaging Local Food Partnerships (e.g. via longer term funding) who are already engaging with public bodies and Public Services Boards to encourage develop local, healthy, sustainable supply chains.
  - c. Advertising – learnings can be taken from several London boroughs who have introduced [restrictions on unhealthy food advertising](#).
  - d. Equal access to green space and leisure facilities to encourage uptake of regular exercise – particularly among adolescent girls [who are more likely to stop exercising](#).

As I stated on 24<sup>th</sup> of June in response to the Nesta report, “obesity is a complex health and well-being issue which the health and social care sector cannot tackle alone and these new figures are worrying.

We need a whole-society, preventative approach and to better use the Well-being of Future Generations Act to keep people well, support people to lead healthy lives, with all sectors working together to take pressure off the NHS.

Involving our public services and our communities is crucial as we consider the different and damaging impacts of obesity and improve outcomes, including for our children and older people and those who are most vulnerable.

We won't be able to tackle Wales' rising obesity rates without a national food strategy for Wales based on preventing ill health and poverty, and enabling affordable access for everyone, to good, local food that doesn't cost the earth.”

I hope you find this information useful in informing your inquiry.

Yours sincerely,

**Marie Brousseau-Navarro**

Deputy Commissioner and Director for Health

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