

Consultation
Response Form

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The National Education Union Cymru (NEU Cymru) welcomes the opportunity to respond to the Welsh Government consultation 'Healthy Weight: Healthy Wales'.

Education professionals are highly committed to making a difference in the lives of the children and young people they deal with. Dealing with the underlying causes of obesity are often difficult and deeply rooted. The way in which head teachers and governing bodies approach the health and well-being of pupils and the level of support given to education professionals, determines the effectiveness of schools in promoting a healthy and sustained lifestyle, and meeting the physical and emotional needs of their pupils.

Consultation Questions

Healthy Weight: Healthy Wales

We are seeking views on what will work to prevent and reduce obesity in Wales and help people achieve and maintain a healthy weight.

If you would like to comment on specific proposals under this theme, please use the summary of proposals document.

1. Are you responding as an individual or on behalf of an organisation? If you're responding on behalf of an organisation, please provide the organisation's name.

Individual

Organisation

Name of organisation: National Education Union Cymru

We have identified some proposals for how we think we can help people to achieve and maintain a healthy weight but we want to know if these are the right proposals, if you know of different approaches which have proven to be effective and how we can best deliver the plan

2. Do you agree that a whole system approach could enable change to take place? If not, why? What are the opportunities, risks and barriers to effective leadership?

We agree that a whole system approach could enable change to take place, but we also think that the proposals are slightly complicated. If Welsh Government is serious about preventing and reducing obesity then it needs to work closely with Public Health Wales and change the diet and nutrition advice that is recommended by them, especially the advice to “*base your meals on starchy foods such as wholemeal bread, pulses, cereals, rice, pasta and potatoes*”. Bread, cereals and pasta are all processed food high in carbohydrates. Eating a diet of real, natural food rather than processed food should be encouraged.

3. Are you aware of any good practice locally? How can we build upon and maximise existing practice and resources to support population change across Wales?

Having researched some studies that have been done, we are aware that doctors, health practitioners and academics, such as Dr Zoe Harcombe, are currently challenging the current low fat/high carbohydrate dietary guidelines. They are advocating (evidence-based) real food diets, which prioritise nutrient density and foods that have minimal impact on blood glucose levels and, according to their findings, it is having a dramatic result on obesity and type 2 diabetes ¹.

4. Do you agree that the proposals set out in HE1 - HE5 would make our food and drink environment healthier?

- 5 Completely agree
4 Agree
3 Neither agree/ disagree
2 Disagree
1 Completely disagree

If you agree, how do you think these could be implemented and what support will be required? If not, why?

HE1

Real food requires no reformulation as it's natural. The 'Eatwell Guide' refers to eating processed food, which is not natural. The current 'Eatwell Guide' is slightly better than the previous 'Eatwell Plate' ² that was launched in 1983 and re-launched in 2013 by Public Health England in association with the Welsh Government, the Scottish Government and the Food Standards Agency in Northern Ireland, which advised 55% of food intake to be carbohydrates. Since the introduction of this guide and according to the Child Measurement Programme 2017/18 ³, obesity rates in 4-5-year-old children in Wales have gradually increased from 11.3% in 2012/13 to 12.4% in 2016/17. However, a slight reduction of 0.4% was seen in 2017/18. Wales also has the highest rate of obese and overweight children in the UK with 26.4% being in this category. We suggest that the Welsh Government needs to base its recommendations around research evidence that suggests eating real food and not reformulated food.

HE2

Many families on limited income cannot afford to buy the healthy, nutritious food that their children need so they turn to less nutritious, cheap processed food to feed their children.

Many of these children have no choice in what they eat, so a 9pm watershed could have limited impact, but we agree that unhealthy foods should not be advertised to children or adults. The Joseph Rowntree Foundation produced a report ⁴ highlighting that rates of poverty are still higher in Wales, than in England, Scotland and Northern Ireland, and almost a quarter of people in Wales live in poverty, and the risk of poverty is also increasing for both working and workless households.

We feel that any food which has some nutritional value, such as fat and salt, is necessary in a person's diet. Sugar on the other hand has no nutritional value and reducing or eliminating sugar intake is welcomed. Adverts for anything other than real, natural food (meat, fish, eggs, dairy products, vegetables, fruits, nuts, etc.) should be severely restricted. Limiting the use of advertising and promotion of unhealthy food in public places is welcomed.

HE3

We are unsure if Welsh Government can affect the way supermarkets can price their products. Welsh Government may be able to regulate price promotion and discounting practices, but we are unsure if this will reduce the price of real, natural food. Families on limited income need to be able to afford to buy the healthy, nutritious food for their children. If Welsh Government is serious about preventing and reducing obesity then they should work with dairy, meat, and vegetable producers, and fishmongers to see how real foods can be promoted and how we can make these foods available and affordable to everyone in Wales.

HE4

Mandating calorie labelling for food purchased and eaten outside of the home in coffee shops and cafes, including the fast food outlets, will be welcomed. However, Welsh Government should be advising people not to consume food that requires a label. Advising people to eat real, natural food should make people think twice before buying and eating processed food i.e. food that requires labels.

HE5

We agree with everything proposed in this section.

5. Do you agree that the proposals set out in HE6-HE7 would provide an environment with more opportunities to be active?

- 5 *Completely agree*
- 4 **Agree**
- 3 *Neither agree/ disagree*
- 2 *Disagree*
- 1 *Completely disagree*

If you agree, how do you think these could be implemented and what support will be required? If not, why?

Whilst we do agree with the proposals, this consultation covers the Welsh Government's ambitions to prevent and reduce obesity in Wales. HE6 and HE7 both relate to increasing physical activity, and whilst this is to be welcomed, obesity is determined by what people consume. A healthy lifestyle includes eating a diet of real, natural food together with a healthy amount of physical activity. If Welsh Government sees increasing activity as one of the ways to tackle obesity they need to listen to sports clubs who provide for children and young people, and ensure they continue to thrive by improving access to high quality resources, such as 3G pitches. There are areas in Wales, e.g. north and mid Wales,

where this provision is scarce. The same can be said for play provision with respect to working with Local Authorities. There are areas in Wales where this provision is scarce.

Physical activity will not reduce obesity if the diet consumed mostly contains processed foods. Exercise will not solve the obesity crisis in Wales.

The Welsh Government's Communities, Equality and Local Government Committee held an inquiry into Participation Levels in Sport in 2013 to which the National Union of Teachers responded and gave oral evidence (Evidence Session 5 – pages 14 – 26) ⁵. During this session, references were made to obesity and its effect on participation levels.

6. Do you agree with the proposals for the following settings (*please identify which setting(s) you wish to comment upon*)?

- Early Years (HS1)
- Schools (HS2)
- Higher/ Further Education (HS3)

5 *Completely agree*

4 *Agree*

3 *Neither agree/ disagree*

2 ***Disagree***

1 *Completely disagree*

If you agree, how do you think these could be implemented and what support will be required? If not, why?

HS1

We agree that strong foundations need to be built in our early years settings, but, as seen in Question 4 above, since the introduction of the Eatwell guide and according to the Child Measurement Programme 2017/18, obesity rates in 4-5-year-old children in Wales have gradually increased from 11.3% in 2012/13 to 12.4% in 2016/17, with a slight reduction of 0.4% in 2017/18. Wales also has the highest rate of obese and overweight children in the UK with 26.4% being in this category. Children need to be taught to eat real, natural food and, as we can see from the figures above, this needs to start before they are 4 years of age, and parents will play a vital role in this.

The Health and Well-being Area of Learning and Experience in the new curriculum will play an important part in creating the whole school healthy weight environment. Schools must re-enforce a diet of real, natural food together with a healthy amount of physical activity.

Embedding daily physical activity is welcomed and to ensure this happens Welsh Government need to guide schools to ensure that when they plan and develop the new Health & Well-being Area of Learning and Experience, that they consider enough time is allocated in the curriculum for physical activity. In recent years, the number of Physical Education (PE) lessons for pupils has decreased significantly, with many Key Stage 2, 3 and 4 pupils only getting one PE lesson per week (for between 45 minutes and an hour), when, under current national curriculum guidelines, pupils should "*engage in frequent and regular physical activity beneficial to their health, fitness and well-being*". One PE lesson per week is not frequent and regular enough to benefit pupils. As mentioned above, Welsh Government needs to guide schools to ensure that when they plan and develop the new Health & Well-being Area of Learning and Experience, that they consider enough timetabled physical activity time within the curriculum during the Foundation Phase and

Key Stage 2 (based on the Child Measurement Programme 2017/18 above), but also in Key Stage 3 and 4. This is essential if Welsh Government sees increasing activity as one of the ways to tackle obesity.

HS2

We welcome the strengthening of school programmes but are concerned that existing programmes don't seem to have had the desired affect if overweight and obesity levels are increasing.

As mentioned in HS1 above, the content of the Health & Well-being Area of Learning and Experience in the new curriculum will play a vital role in supporting learners to maintain healthy diets and physical activity levels. Welsh Government needs to ensure that it contains enough timetabled physical activity time within the curriculum so that teachers can fully engage pupils in the benefits of being active which will then encourage them to stay active.

One of the places where children from socially deprived backgrounds can get a nutritious meal is at school, so updating the Healthy Eating in Schools (Wales) Regulations is welcomed. However, If Welsh Government is serious about preventing and reducing obesity these regulations need to advise and encourage schools to provide real, natural food for their pupils. We would also suggest that the Eatwell Guide, which is present in all schools, is amended to reflect this as at present it encourages children to eat processed food. We also suggest that the new guide is made available for education professionals via Hwb.

We fully support the School Holiday Enrichment Programme, but more information needs to be made available as to the amount of funding that will be invested and the geographical areas that will be targeted.

We welcome the embedding of daily physical activity at an early age as the Child Measurement Programme 2017/18 research has shown how important it is. However, the Daily Mile and other similar activities should not be used to replace Physical Education lessons on the timetable.

HS3

We welcome the fact that Welsh Government wants to work with Colleges Wales, Universities Wales and Student Unions to improve opportunities for healthy food provision. However, Welsh Government must ensure that these independent institutions do all they can to provide their students with as much real, natural food as possible on their menus and limit the choice of processed food.

As mentioned in Question 5 above, increasing physical activity is to be welcomed, and Further and Higher Education institutions usually have access to much better physical activity resources (fitness gyms, 3G surfaces, etc.). However, obesity is determined by what people consume and a healthy lifestyle includes eating a diet of real, natural food together with a healthy amount of physical activity. Physical activity will not reduce obesity if the diet consumed mostly contains processed foods. Exercise will not solve the obesity crisis in Wales.

7. Do you agree that proposals HP1 – HP2 will support behavioural change and increase conversations about healthy weight through front line services?

5 *Completely agree*

4 *Agree*

3 **Neither agree/ disagree**

- 2 *Disagree*
- 1 *Completely disagree*

If you agree, how do you think these could be implemented and what support will be required? If not, why?

There are many factors that prevent people from adopting a healthier diet or being physically active and these include income, well-being (physical, mental & social), access to resources, geographical location and social background. Many socially deprived and poor areas have high obesity rates. Families on limited income cannot afford to buy healthy, nutritious food so they turn to less nutritious (high in sugar and carbohydrates), cheap processed food to feed themselves and their children.

Whilst we welcome Welsh Government's commitment to work with Public Health Wales to attempt to change people's behaviours, previous research has shown that this is very difficult to achieve. In a 30-year study from 1979 until 2009, Professor Peter Elwood and the Caerphilly population study team found that:

"The adoption of a healthy lifestyle by men was low and appears not to have changed during the subsequent 30 years, with under 1% of men following all five of the behaviours and 5% reporting four or more in 1979 and in 2009." ⁶

If the Welsh Government is serious about preventing and reducing obesity then it needs to engage with obesity experts in Wales, such as Dr Zoe Harcombe, if they want to see a significant change in people's behaviours when it comes to the food people eat.

8. Do you agree that proposals HP3 – HP4 will enable children and families to support a healthy weight?

- 5 *Completely agree*
- 4 *Agree*
- 3 ***Neither agree/ disagree***
- 2 *Disagree*
- 1 *Completely disagree*

If you agree, how do you think these could be implemented and what support will be required? If not, why?

We welcome all support given for families that will enable them to guide their children towards eating real, natural food and not eat processed food. As seen in Question 4, the Child Measurement Programme 2017/18 found obesity rates in 4 - 5-year-old children in Wales to have increased over the last 5 years. Wales also has the highest rate of obese and overweight children in the UK with 26.4% being in this category. We suggest that the Welsh Government needs to base its recommendations around research evidence that suggests eating real food and not reformulated food.

9. Do you agree that proposal HP5 will develop a clinical pathway to ensure those who are overweight or obese can access the right kind of support?

- 5 *Completely agree*
- 4 *Agree*
- 3 ***Neither agree/ disagree***
- 2 *Disagree*
- 1 *Completely disagree*

If you agree, how do you think these could be implemented and what support will be required? If not, why?

We welcome all support given for individuals who are overweight or obese that will enable them to change their eating and activity behaviours. As mentioned in Question 7 above, Welsh Government needs to engage with obesity experts in Wales, such as Dr Zoe Harcombe, if they want to see a significant change in people's behaviours when it comes to the food they eat.

10. This question relates to the impact the proposals might have on certain groups. Do you think the proposals in this consultation document might have an effect on the following?

- o Those living in rural areas
- o Welsh language
- o Equality
 - Age
 - People with disabilities
 - Sex
 - Transgender
 - Marriage or civil partnerships
 - Pregnancy and maternity
 - Race
 - Religion
 - Sexual orientation
- o Children and young people

If Welsh Government implements its Leadership and Enabling Change approach equally across Wales, then the proposals shouldn't have any negative impact on any of the above. If everyone gets the same education, advice, and access to resources, everyone has the same advantages and opportunities.

11. Do you have any other comments about these proposals?

As mentioned previously, if the Welsh Government is serious about preventing and reducing obesity in Wales, then it needs to base its recommendations around research evidence that suggests eating real food and not reformulated, processed food, is what's required.

Welsh Government also needs to engage with obesity experts in Wales, such as Dr Zoe Harcombe, if they want to see a significant change in people's behaviours when it comes to the food people eat and thus having a positive impact on the prevention and reduction of obesity in Wales.

¹ Harcombe Z, Baker J, Davies B. Food for Thought: Have We Been Giving the Wrong Dietary Advice? Food and Nutrition Sciences 2013;4(3):240-44 doi: 10.4236/fns.2013.43032

- 2 <http://www.fao.org/3/a-as838e.pdf>
- 3 <http://www.wales.nhs.uk/sitesplus/documents/888/CMP%20report%20%28Eng%29.pdf>
- 4 file:///C:/Users/stws/Downloads/web_jrf_-_uk_poverty_2018.pdf
- 5 <http://senedd.assembly.wales/documents/s18884/27%20June%202013.pdf>
- 6 <https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0081877>