

Consultation: Healthy Weight: Healthy Wales

Which? is the largest consumer organisation in the UK with more than 1.3 million members and supporters, 57,000 of whom live in Wales. We operate as an independent, apolitical, social enterprise working for all consumers and funded solely by our commercial ventures. We receive no government money, public donations, or other fundraising income. Which?'s mission is to make individuals as powerful as the organisations they have to deal with in their daily lives, by empowering them to make informed decisions and by campaigning to make people's lives fairer, simpler and safer.

Summary

- Which? welcomes this consultation on the Welsh Government's national ambitions to prevent and reduce obesity in Wales and supports the overall approach, recognising the importance of actions focused around leadership and enabling change, healthy environments, healthy settings and healthy people.
- Our research has shown strong consumer support for actions to make it easier to eat healthily, including to reduce fat, sugar and salt in foods, to make promotions healthier and to ensure consistent front of pack labelling, based on the traffic light scheme.
- It is essential that the government ensures that there is a concerted and joined up approach to delivery, with a consistent approach across all government policies, as well as at regional and local level.

Introduction

Our research has repeatedly found that it can be too difficult for people to make healthier choices and that there is support for actions to improve the environment in which people make their choices, including tackling the balance of promotions, reducing fat, sugar and salt levels in foods and improved labelling and calorie information. Overweightedness and obesity are major challenges in Wales with over a quarter of four to five year olds overweight or obese and six in ten adults.

Which?'s most recent survey on healthier choices conducted in 2018¹, for example, found that 78% of people think that the government has at least some responsibility in encouraging people to eat healthily. Only 40% of people agreed that the government was doing enough

¹ Research Now, on behalf of Which?, interviewed 1003 adults residing in the UK online, between 12th and 17th January 2018. Data were weighted to be representative of the UK population by age and gender.



to help people eat healthily. A little over one third (37%) thought supermarkets were and only 3 in 10 (32%), food manufacturers.

Consultation questions

We have focused on the consultations of most relevance to our work.

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 with the steps proposed to develop a long-term, whole system approach to address obesity based on the core principles set out in LEC1, including a national implementation board that is accountable to Ministers. It will be important that there are effective mechanisms to engage stakeholders and that this includes the breadth of interest groups, including consumer organisations and representatives. Leadership from the highest level is essential as well as a consistent approach across all Welsh Government policies.

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

Agree (4)

While there has been a lot of focus on actions to encourage healthier diets in recent years, including through the UK Government's Childhood Obesity Plans, there remain a number of outstanding issues that still need to be effectively tackled.

- There has been a lot of work on product reformulation, but further support for businesses
 to do this will be essential. Our survey, referred to above, found that making foods with
 less fat, sugar and salt was the top action that people wanted manufacturers to take to
 make it easier to eat healthily. It was also the top action wanted from cafes, take-aways
 and restaurants.
- We strongly support further action to tackle children's exposure to TV and online food
 advertising for unhealthy foods as there is clear evidence that this influences their
 preferences and choices. Restrictions must reflect the way that children are now exposed
 to advertising including through digital advertising. We welcome the intention to tackle the
 current gaps in the advertising codes for brand generated, as well as licensed characters
 and celebrity endorsements for foods high in fat, sugar and salt (HFSS).
- Which? conducted research in 2016² to monitor the balance of promotions included in price promotions across the main supermarkets. This found that the majority of price promotions were on less healthy foods. More than half of confectionery was on offer compared to only around a third of fresh fruit and vegetables. We also conducted a small study alongside this which highlighted how confectionery and other HFSS foods were promoted close to the checkouts and that this was also carried out in some toy shops, directly appealing to children. Our 2018 survey showed that tackling the balance of price promotions by including more healthier options in supermarket price promotions was the joint top action that consumers thought supermarkets should take to make it easier to eat healthily.

 $^{^2\ \}text{https://press.which.co.uk/whichpressreleases/more-supermarket-promotions-on-less-healthy-food-scotland/}$



- Food eaten outside the home makes a significant contribution to people's diets, but it can
 be difficult for people to assess how healthy their food choices are in many cases.
 Which?'s survey, referred to above, found that 6 in 10 people thought that the amount of
 calories should be provided on the food in cafes and restaurants for transparency. When
 we asked if this should be a mandatory requirement, 57% of people agreed that this
 should be the case, with a quarter (25%) saying that they neither agreed or disagreed
 and just 14% disagreeing.
- Which? research has found strong support for the traffic light nutrition labelling scheme, but this is not currently provided on all food products. A Which? survey conducted in December 2019³ found that there is a high level of awareness of the traffic light scheme 89% know of it and the same percentage also think that the scheme is helpful. 3 in 5 people (60%) think the colour coding is the most important aspect of the scheme, followed by the amount of each nutrient (%) per portion (20%). More than 4 in 5 (85%) would support all manufacturers (including own-brands) being required to put traffic light labelling on their food products.

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

Agree (4)

This is not an area where Which? has carried out research but we support the encouragement of the evidence-based actions to create healthy weight environments.

6. Do you agree with the proposals for the following settings:

Early years
Schools
Higher/ Further Education
Workplace
NHS
Public Sector

Agree (4)

We agree that actions will be needed across all of these areas in order to help support people make healthier choices. In particular we consider that childcare and school settings are an important area for promotion of healthier food choices so welcome the intention to improve guidance and review the Healthy Eating in Schools (Nutrition Standards and Requirements) (Wales) Regulations. We also support the review of food standards in NHS settings.

Which? April 2019

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 $^{^3}$ Populus, on behalf of Which?, conducted a survey to understand consumers' attitudes to front of pack nutrition labelling. A sample of n=2385 over 18s in the UK were interviewed online between $10^{th} - 11^{th}$ December 2018. The data has been weighted by gender and age to be representative within the UK



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