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Engagement Report

## Healthy Food Environment

Analysis of engagement on the Healthy Food Environment  
Consultation

January 2023

Mae'r ddogfen hon ar gael yn Gymraeg hefyd / This document is also available in Welsh  
Rydym yn croesawu gohebiaeth a galwadau ffôn yn Gymraeg / We welcome correspondence and telephone calls in  
Welsh

## **Overview**

This document provides a summary of engagement for the Healthy Food Environment Consultations

## **Action Required**

This document is for information only.

## **Further information and related documents**

Large print, Braille and alternative language versions of this document are available on request.

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## **Additional copies**

This engagement report and copies of all the consultation documentation are published in electronic form only and can be accessed on the Welsh Government's website.

[Link to the consultation documentation](#)

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## Glossary

<b>Acronym</b>	<b>Definition</b>
HFSS	High in Fat, Sugar and Salt
NGO	Non-Governmental Organisation
NPM	Nutrient Profiling Model

## **Executive Summary**

- i. To address the increasing issue of obesity in Wales, Welsh Government are looking to introduce legislation that strengthens and supports a healthier food environment for the consumer. As part of this process, a consultation was launched on 9 June 2022, seeking views from the public and stakeholders, and closed on 1 September.
- ii. Within this period, a series of qualitative workshops and surveys were carried out by independent research consultants (Miller Research and Cazbah), engaging with stakeholders within the food and drink sector and the health profession, as well as the wider public.

### **Public priority groups**

- iii. Miller Research held a series of eight focus groups to capture the views from general public on Welsh Government proposals. In total 51 participants engaged. The groups were categorised as follows: primary aged children, secondary aged children, young people (18-25), parents and carers, people aged 45 or over, people from the socio-economic groups C1, C2, D and E, people from minority ethnic backgrounds and those on weight-loss journeys.
- iv. Groups were asked questions about proposals within the healthy food environment consultation. These include restricting the promotion of high fat, sugar or salt (HFSS) products, mandatory calorie labelling for the out of home sector, placing restrictions on the servings of sugary soft drinks, and limiting hot food takeaways.
- v. There was a widespread consensus across the groups that action should be taken to restrict the ease of access and promotions that make food which is high in fat, sugar or salt attractive to consumers. However, in the context of the cost of living crisis, it was felt that there needs to be offers and subsidies on healthy food in its place, as the price of healthy food is currently viewed as too high.
- vi. All groups supported the concept of placing restrictions on the servings of sugary soft drinks, especially a ban on free refills of sugary drinks.

- vii. Opinions were more mixed on calorie labelling requirements, with some participants recognising the health benefits, whilst others raised concerns about the effects this would have on those with eating disorders.
- viii. Parents and carers were most in agreement that the number of takeaways near schools and colleges should be limited, whilst school aged pupils were opposed to this proposal. Most groups thought that the restrictions would be difficult to implement in practice and their effectiveness could be undermined by takeaway delivery services.

#### **‘Your Views and Voices’ event**

- ix. On 19 July 2022, Cazbah held an all-day engagement event with stakeholders, including health professionals, relevant non-governmental organisations (NGOs) and food industry representatives to gain their views on the proposals.
- x. An overwhelming majority (88 per cent) of delegates agreed Welsh Government should introduce some form of legislation to create a healthier food environment. Expected benefits to such an intervention included improved consumer health, whilst the major concern was the financial challenges faced by consumers in the context of the cost of living crisis.
- xi. Almost all health professionals and NGOs supported legislation restricting the placement of HFSS products, as well as restricting free refills and large portion sizes of sugary soft drinks. Industry representatives had more reservations about how restrictions would be implemented practically and consistently.
- xii. There was no clear consensus amongst delegates regarding which products or settings should be exempt from the proposed restrictions. However, 83 per cent of delegates agreed that existing planning and licencing support should be reviewed to address the distribution of hot food takeaways, particularly close to secondary schools and colleges.

### **Roadshow events**

- xiii. Between July and August 2022, seven public engagement events were held in different locations across Wales. In total 354 surveys were taken by Cazbah.
- xiv. A clear majority of survey respondents believed stopping the promotion of less healthy food is a good idea. An even greater proportion of people believed in removing less healthy foods away from “high traffic” areas.
- xv. Most respondents thought that calorie labelling would deter people from eating less healthy food. The majority of respondents also believed stopping the refill of sugary soft drinks and banning larger soft drink portion sizes was a good idea.
- xvi. There was significant support to implement limitations on the number of takeaways in a community, not just near schools and colleges, but across towns and cities more widely.

# 1. Introduction

## Background

- 1.1 There are several severe, long-term health conditions associated with excess weight, including diabetes, heart disease and cancer, as well as adversely affecting mental health. With around a third of reception age children and 60 per cent of adults in Wales classified as overweight or obese, confronting obesity is a significant public health challenge. Obesity is particularly prevalent in more deprived areas. The coronavirus (COVID-19) pandemic has further underlined the associated health risks with poor diet and has exacerbated these pre-existing health inequalities.
- 1.2 The [Healthy Weight: Healthy Wales](#) strategy, published in 2019, sets out a long-term vision for Wales to reduce and prevent obesity. This includes a commitment by 2030 to create “food environments where healthier food and drink is widely available, appealing and affordable, making the healthier choice the easy choice.” A commitment to consult upon the food environment was set out in the [2022-24 Delivery Plan](#).
- 1.3 The Welsh Government would like to introduce legislation to build upon previous voluntary actions, providing clarity and consistency across the food industry, and supporting a healthier food environment for the consumer.

## Approach to Consultation

- 1.1 The Healthy Food Environment Consultation proposes actions, including legislation, to make achieving a healthy balanced diet easier. Specifically, how can we shift the balance of promotions and marketing towards healthier choices (Healthier Shopping Baskets), how can we improve the information available to us when eating out of the home to support healthier choices (Healthier Eating out of the Home) and how can we shift the balance, so that our daily journey through the places we live can better support healthier choices (Local Food Environments).
- 1.4 The consultation on the proposal to improve the Healthy Food Environment in Wales went live on 9 June 2022 seeking views from industry representatives, health professionals and the wider public and closed on 1

September. The consultation phase provided a vital opportunity for all stakeholders to provide input ahead of further decision making by the Welsh Government.

- 1.5 Prior to the consultation's launch, Miller Research, in collaboration with Working Word and Cazbah, was commissioned to undertake an independent consultation analysis. Alongside analysis of the responses to the online Healthy Food Environment Consultation, this included analysis of workshop discussions with stakeholders and specific groups of the public. There were also roadshow events across Wales to raise awareness of the consultation where individuals were asked to complete a short survey.

### **Methodology**

- 1.6 All the engagement included questions and discussion around the main proposals within the Healthy Food Environment Consultation, which are based around three main themes:
- **Healthier Shopping Baskets**
    - Should we introduce legislation to restrict the promotion of products high in fat, sugar or salt
    - Should we introduce legislation to restrict the placement of products high in fat, sugar or salt
  - **Healthier Eating Out of the Home**
    - Should we mandatory calorie labelling in all out of home settings
    - Should we place restrictions on the servings of sugary soft drinks
  - **Local Food Environments**
    - What support and measures could we put in place to help improve the availability of healthier options within local areas
    - Should we review existing planning and licensing support to address the distribution of hot food takeaways, particularly close to secondary schools and colleges
- 1.7 The first element of qualitative engagement as part of the consultation was the 'Your Views and Voices' stakeholder event, which took place on 19 July 2022.

- 1.8 This one-day online event included a short plenary section with presentations explaining the background to the consultation before delegates took part in group discussions based on each of the healthy food environment consultation themes. Over 50 people representing stakeholders from across Wales were split into six groups, which were independently facilitated and scribed.
- 1.9 Participants were from organisations such as the National Health Service (NHS), Public Health Wales (PHW) and Sports Wales alongside local authorities, health charities, and representatives from the food industry.
- 1.10 The ‘Your Views and Voices’ event was closely followed by seven public engagement roadshow events held across Wales in July and August of 2022, engaging with Welsh communities as part of the consultation process.
- 1.11 The events took place as follows:
- Royal Welsh Show, Builth Wells – 20 July
  - Ty Pawb, Wrexham – 21 July
  - Swansea City Centre – 25 July
  - St David’s Centre, Cardiff – 27 July
  - National Eisteddfod, Tregaron – 3 August
  - Tonypandy Market – 5 August
  - Anglesey Show – 9 and 10 August
- 1.12 The aim of the events was to raise awareness of the healthy food environment consultation and gather the opinions of event attendees on the key themes. People were invited to complete a short survey. It should be noted that many people declined, with some commenting that they were not interested in the topic area.
- 1.13 The final component of the consultation’s qualitative engagement took place between 20 July and 31 August. Miller Research conducted eight workshops via Microsoft Teams covering areas of discussion under the Healthy Food Environment consultation. Each workshop lasted one hour.
- 1.14 In total, 51 participants engaged via the workshops.

1.15 Groups included:

- Primary aged children (10-11)
- Secondary aged children (12-16)
- Young People (18-25)
- Parents and carers (from babies to teenagers)
- Those in socio-economic groups C1, C2, D and E
- Black, Asian Minority Ethnic backgrounds
- People aged 45 or over
- People on weight-loss journeys.

1.16 Primary school participants were asked questions which focussed on restrictions on sugary soft drinks (Healthier Eating out of the Home) and hot food takeaways near school (Healthier Local Food Environments). Secondary school participants were asked similar questions with an additional discussion about calorie labelling.

1.17 Questions for the six adult-based focus groups were based on all three of the themes within the healthy food environment consultation.

1.18 Each focus group had a minimum of two facilitators, where information was transcribed and subsequently quality assured. After the workshops were completed, an online collaborative mind mapping tool was used to process, categorise and analyse these responses and draw out key themes and group ideas.

### **Report Structure**

1.19 This report summarises the findings of these various engagement approaches. Chapter 2 explores the public engagement workshops conducted by Miller Research. Chapter 3 summarises the findings of the 'Your Views and Voices' stakeholder event and Chapter 4 discusses the results of the series of roadshow events. The stakeholder event and roadshows were managed by Cazbah.

## **2. Healthy Food Environment Consultation: Workshop Responses**

2.1 This chapter presents the findings from a series of eight virtual workshops with people representing the following demographic groups: primary age children, secondary age children, young people, parents and carers, socio-economic groups C1, C2, D and E, ethnic minority groups, and people aged 45 plus years. There was also a group with people on weight-loss journeys. Findings have been structured thematically and by group with areas of consensus and difference highlighted.

### **Theme 1: Healthier Shopping Baskets**

#### **Legislation restricting the promotion of HFSS products**

- 2.2 There was widespread consensus across the focus groups that action should be taken to restrict the ease of access to unhealthy food. Promotional offers on food high in fat, sugar or salt (HFSS) was seen as incentivising unhealthy consumer choices, contributing to obesity and dental issues, particularly amongst those with lower incomes.
- 2.3 Participants in the 45+ group suggested there should also be more education surrounding products that are perceived as healthy, but are often HFSS, such as cereal bars.
- 2.4 In the context of the cost of living crisis, participants across all groups felt that if there were to be any restrictions on the promotion of unhealthy food, there needs to be offers and subsidies on healthy food in its place, as the price of healthy food is currently viewed as too high.
- 2.5 There was a minority of participants across the groups that thought that responsibility for food choices should ultimately lie with the consumer, without any government interference. Some concerns were also raised about how enforceable a ban would be.
- 2.6 Overall, there was a consensus that, if such legislation were to be introduced, there has to be 'one rule for all' to prevent loopholes, and so online shopping should come under the proposed restrictions.

## **Legislation restricting the placement of HFSS products**

- 2.7 Participants across all groups considered the placement of HFSS products to be a problem in encouraging unhealthy food purchases, especially the promotion of unhealthy food at checkouts, which was considered to be the biggest issue. There was widespread agreement across the groups that HFSS foods should be in 'less visible places'. Participants praised certain supermarkets that have healthier options at checkouts, claiming this model should be emulated more widely.
- 2.8 Participants in the weight loss journey group felt that seeing less advertising of unhealthy foods on the shop floor, helped people to make better choices, consciously and subconsciously. This was supported by those aged 45 or over, who felt that restrictions on placement were more effective than restricting promotions. Those in the young people group felt healthy food should be located in the most prominent locations, with fruit and vegetables placed at store entrances.
- 2.9 As was the case with legislation restricting promotion of unhealthy food, participants across different groups expressed scepticism at the ability to enforce legislation on product placement, especially in small, independent shops.

## **Determining which products are HFSS**

- 2.10 As part of the focus groups, participants were shown two lists of food products. 'Option A' listed foods of most concern for childhood obesity and 'Option B' included a wider list of HFSS foods. They were asked to say which list should be used for the proposed restrictions. The list is included at Annex A.
- 2.11 There was a consensus across the different focus groups that both lists contained food and drink which should be categorised as unhealthy. However, on balance, List A was viewed as containing the foods which should be prioritised for the restrictions as participants felt people 'overconsume' food in Option A, whereas they interpreted the foods under Option B as more likely to be eaten in smaller portions. Participants talked

about there being too many processed foods on offer in shops, and these were the products that should be targeted by restrictions.

- 2.12 Participants in the CDE socio-economic group raised concerns about categorising certain foods as ‘unhealthy’ as this could increase the risk of people developing eating disorders, feeling that there needed to be more education on the importance of consuming certain foods in moderation. Those aged 45 or over agreed education was important when it comes to incentivising healthy eating.
- 2.13 Some participants thought some products were or could be unfairly included within the restrictions. Participants from the ethnic minority group felt yoghurt and quiche should not be classified as unhealthy., whilst those in the older age group stated that there are some healthy ready meals available that may unfairly be included. Conversely, products such as cereal bars and flavoured water were viewed as healthier than they are commonly perceived.

## **Theme 2: Healthier Eating Out of the Home**

### **Proposed restrictions on the serving of sugary soft drinks**

- 2.14 All groups supported the concept of a ban on the free refill of sugary drinks. Participants largely claimed that free refills “incentivise bad behaviour” and “encourage people to consume more than they want or need.” It was noted by those in the parents and carers group that even the ‘diet’ version of the various soft drinks contains unhealthy sweeteners.
- 2.15 There was a consensus from participants engaged that people should have to pay for each individual soft drink, with restaurants and other outlets offering free jugs of water on tables instead. This option was noted as having the benefit of encouraging people to drink more water, whilst saving money for businesses.
- 2.16 Overall, there was a consensus across the groups that free refills are a bigger issue than the availability of large portion sizes of soft drinks in the out-of-home sector. However, parents and carers did state that ‘supersizing’ should not be encouraged given the current rates of obesity and diabetes

- 2.17 There was a minority who raised some concerns about the ban restricting individuals' freedom of choice, especially as people tend to eat out as an occasional 'treat and thus have access to free soft drink refills infrequently.
- 2.18 When asked, most participants claimed the proposed restrictions on soft drinks would not affect them personally.

### **Calorie labelling requirements**

- 2.19 Some of the secondary aged participants said they frequently look at calorie labelling of products for health purposes, claiming it may alter their decision to consume food. Participants from the young people group saw both positives in calorie labelling, in terms of fitness and health, but also risks in exacerbating eating disorders. Similarly, those on a weight loss journeys stated they always looked at calories on menus but also referenced people who struggle with eating disorders and the need for a greater focus on nutritional content instead. Most participants from the black and minority ethnic backgrounds group said they paid attention to calorie labels, and that it had affected what food they ate based on its calorie content.
- 2.20 On the issue of whether calorie labelling should be mandated in the out-of-home sector, secondary school participants concluded that it should be made more clear what products were high in sugar, salt on takeaway and restaurant menus. Both the minority ethnic and weight loss journey group felt calorie labelling should be available in all settings.
- 2.21 Participants from the weight loss journeys group expressed a desire for a more positive labelling system that specifically quantified the healthy content in food, whilst the young people group felt viewing calories on menus should be 'opt-in' rather than an 'opt-out', as "labelling foods creates unhealthy mind-sets".
- 2.22 There was cross-group support for a traffic light system, with participants deeming it 'less harmful' than calorie labelling, whilst still enabling informed choices.

## **Exemptions from calorie labelling and soft drink requirements**

- 2.23 When asked whether children's menus should be exempt from calorie labelling, parents and carers responded that they are best placed to make decisions on what food is best for children. Concern was expressed across groups that teenagers are at particular risk of developing eating disorders, stating "something needs to be done safely to avoid obsession".
- 2.24 Young people and the CDE socio-economic group felt regular menus should be available without calorie labelling, to allow those with eating disorders to escape from the triggers.
- 2.25 Conversely, parents and carers, the 45 or older group, and the weight-loss group felt calorie labelling should be universal as "it is normal to have them displayed". Overall, though, participants concurred more needed to be done to educate children to break any unhealthy eating habits.

## **Theme 3: Healthier Local Food Environments**

### **Limitations on the distribution of takeaways near certain settings**

- 2.26 Primary and secondary school aged participants stated that their school was walking distance from takeaway settings but claimed they do not visit them as they are not allowed off school premises during school hours. Secondary school participants said, however, that some sixth form pupils ordered fast food to be delivered to them at lunchtime.
- 2.27 School aged pupils were opposed to limiting the number of takeaways near schools and colleges, saying it should be an individual choice and that it would harm local businesses.
- 2.28 Conversely, the parents and carers group were most in favour of limiting takeaways near schools.
- 2.29 Most groups expressed scepticism at the enforceability and effectiveness of such restrictions given that people use delivery services, and schools are often situated in commercial areas.
- 2.30 Additionally, participants noted many outlets do not open until the evening anyway, and some felt that restrictions could even increase school children's temptation to choose unhealthy food.

Support to be put in place to increase healthy options in local areas

- 2.31 To conclude the focus groups, participants were asked what could be done to create a healthier food environment. Young people suggested there should be subsidies or some form of tax relief for healthy food establishments.
- 2.32 The weight-loss group suggested better deals on fruit and veg, alongside government campaigns on TV supporting healthy eating.
- 2.33 Parents and carers felt more should be done to teach good eating habits and offer cheap, healthy food options in schools.
- 2.34 Participants from the ethnic minority group proposed installing water taps in supermarkets and throughout towns.
- 2.35 Those who were aged 45 or over felt introducing eating in communal community settings could help improve eating habits.
- 2.36 Finally, participants from the CDE socio-economic group stated the need to diversify food options, whilst acknowledging the price of food is the greatest determinant of consumer habits.

### **3. Stakeholder Engagement ‘Your Views and Voices’ event findings**

- 3.1 This chapter summarises key points from group discussions on the Healthy Food Environment Consultation held by Cazbah as part of the Your Views and Voices stakeholder event, on 19 July 2022.
- 3.2 Participants were from organisations such as NHS Wales, PHW and Sport Wales alongside local authorities, health charities and representatives from the food industry.
- 3.3 The food industry representatives were allocated the same group for the discussions. The remaining delegates were split more randomly into the remaining five groups. For the purposes of the analysis below, these delegates are referred to as belonging to the NGO groups.

#### **Theme 1: Healthier Shopping Baskets**

##### **Q.1a Should Welsh Government introduce legislation to restrict the value-based promotion of high fat, sugar or salt (HFSS) products? For example, temporary price reductions, multi-buy offers, and volume offers**

- 3.4 Of the delegates who took part in the poll, 88 per cent agreed that the Welsh Government should introduce legislation.
- 3.5 Industry representatives acknowledged that, while the proposal to introduce legislation would probably happen, they are keen to ensure that the implementation is practical from a business/industry perspective.
- 3.6 While there was strong agreement from the NGO groups for the proposal, some delegates had caveats to this agreement while others felt the question needed further discussion. This included the suggestion to go further than just fat, sugar and salt and also consider sustainability and food with a high environmental footprint. It was noted that there is a need to provide guidance and support for supermarkets.

##### **Q.1b Which categories of food products should be caught by the proposal?**

- 3.7 Delegates were asked whether legislation should focus on HFSS food and drink that most affect children's health and weight (Option A) or all products high in fat, sugar or salt (Option B). The lists are included at Annex A.
- 3.8 There was general agreement between all NGO groups that a phased approach is needed, with Option A the priority.
- 3.9 NGO groups also suggested that this phased approach should be combined with an investment in education to do more to teach the public about nutrition including cooking courses and communications around the importance of a balanced diet and sensible portion sizes.
- 3.10 Several groups discussed what they felt to be 'grey areas' in both options with some delegates commenting that options were over-simplified and that a 'broad-brush' approach is not beneficial.
- 3.11 Food industry representatives did not oppose the proposal and agreed that Option A is preferable. Consistency with England was seen as the key factor amongst this group. It was stated that many of the Option B products were initially included in the Public Health England draft calorie reduction proposals but have now been removed.

**Q1.c What do you feel are the benefits and challenges of the proposal to introduce legislation to restrict value-based promotion of HFSS products?**

- 3.12 Benefits suggested by both the food industry and NGO groups focused on consumer health. Benefits included:
- the likelihood that legislation will lead to reformulation of products to reduce fat, sugar or salt content
  - consumers will think more about the food they are buying, this could encourage a culture shift towards healthier lifestyles
  - healthier diets should reduce strain on the NHS in the long term.
- 3.13 There was an in-depth and wide-ranging discussion about the challenges of implementing the new legislation including:

- concerns regarding the cost of living and the need to ensure the legislation does not add to the financial challenges faced by some consumers
- the need to ensure the food industry is given enough time to prepare for the changes
- the importance of supporting and educating consumers to make healthier choices, including addressing any misconceptions regarding the 'value' gained from food promotions.

3.14 The food industry and NGO discussion groups both discussed the challenges presented to the food industry. These included ensuring that small producers and manufacturers in Wales are not adversely affected by the proposals.

3.15 Food industry representatives also emphasised a need for consistency across the UK to minimise disruption. There were also concerns that Wales may adopt the revised 2018 Nutrient Profile Model (NPM), rather than using the current 2004/5 NPM.

**Q.1.d Should the following exemptions apply for value-based promotion restrictions?**

**(i) Price reductions for close to use-by date products**

3.16 Opinions varied with 45 per cent agreeing that products close to use-by-date should be exempt. Those that agreed with the exemption argued it would reduce food waste.

3.17 The NGO groups were more likely to be undecided or against the exemption. For example, arguing exemptions may create loopholes that could be exploited.

**(ii) Non-pre-packed products**

3.18 Only 30 per cent of delegates were supportive of this exemption. Those who agreed with the exemption argued that there are too many variables for non-pre-packed products which makes them difficult to include within the legislation.

3.19 Those against the exemption felt that all HFSS products should be included regardless of how they are packed.

**(iii) Micro and small businesses (unless they are part of a symbol group with 50+ employees)**

3.20 Only 24 per cent of delegates were supportive of the exemption. The food industry group were supportive of the exemption arguing that the proposal would be very economically challenging for smaller businesses, who are already struggling to compete with larger stores. There was a suggestion that symbol group premises should also be exempt, as they often operate quite independently within the franchise.

3.21 Most of the NGO group delegates were unsure or against the exemption. They argued that the legislation should apply to all businesses, with no exemptions, as small businesses also contribute towards an unhealthy food environment. This is especially the case in rural communities, where access to supermarkets is more limited. Delegates also mentioned that children often purchase unhealthy food and drink from small businesses on their way to or from school.

**Q1.e Should legislation be introduced to restrict the placement of HFSS products in certain retail areas? For example, the store entrance, at the till, at the end of the aisle, in free standing display units.**

3.22 All delegates from the NGO groups supported this legislation as an effective way to reduce impulse buying of HFSS foods. They suggested that the food industry, especially smaller businesses, should be supported to make the changes. Delegates wanted to ensure as many settings as possible were included within the legislation, such as petrol stations, health and leisure centres.

3.23 Industry representatives were concerned with how such restrictions would be implemented. They requested more clarity as well as consistency with England. They also warned against possible unforeseen consequences of introducing such restrictions. For example, HFSS products being replaced in certain high profile retail areas with other unhealthy products such as

alcohol-related products, which in turn would have a negative public health impact.

**Q1.f Which other exemptions, if any, do you think should apply?**

3.24 NGO groups did not identify further exemptions although several groups highlighted the impact of positioning and suggested action to ensure that unhealthy products are not placed at eye level, especially children's eye level.

3.25 Food industry representatives also did not identify any further exemptions but emphasised the need for cross border alignment. The importance of clear and timely communication and engagement with retailers and manufacturers was also stressed.

**Theme 2: Healthier Eating out of the Home**

**Q.2.a Should Welsh Government mandate calorie labelling in all 'out of home settings' regardless of the size of business?**

3.26 The proposal generated much debate, with 43 per cent of respondents agreeing with the proposal, and 53 per cent unsure or in disagreement.

**Q2.b What are the benefits and challenges of introducing calorie labelling?**

3.27 Groups considered the main benefits of calorie labelling to be:

- consumers will be able to make better informed decisions about their food choices, which should reduce overconsumption
- it will generate awareness and conversations about the food we eat, which could mean people are more open to other health promotion opportunities such as cooking classes etc.
- an opportunity for businesses to reconsider the calorie content of the food on offer and introduce menu options that are less calorific.

3.28 Groups considered the main challenges of calorie labelling to be:

- those with diagnosed eating disorders or disordered eating might be adversely affected

- it could increase 'food shaming' whereby people feel stigma and judgement based on their food choices.
- the proposal will be difficult to implement, especially for smaller businesses if they cook from scratch and change their menu regularly.

3.29 The discussions included suggestions to broaden the information available to consumers. A low-calorie meal is not necessarily a healthy balanced meal. Conversely some high-calorie foods, such as nuts and seeds, are healthy in moderation. Other nutritional information such as fat, sugar or salt content are also important.

**Q2.c Should menus marketed specifically at children be exempt from calorie labelling**

3.30 Half of the delegates agreed with the exemption. Reasons for their support centred around the huge spectrum of nutritional needs for those classified as 'children'. There was also some concern that providing calorie information to children may encourage them to develop an unhealthy relationship with food at a time when they are particularly at risk of developing an eating disorder – eating disorders can affect people of all ages, but typically begin in the teenage years or even earlier.

3.31 Those who were unsure or disagreed with the exemption argued that children need to be taught about nutrition. They did suggest, however, that the information could be presented in a more child-appropriate way. Other delegates thought information could be available to the parents about the children's menu choices.

**Q2.d Should free refills of sugary soft drinks in the 'out of home' sector be prohibited, and larger\* sugary soft drink portion sizes restricted? (\* where larger is defined as more than a pint/ 0.57 litres)**

3.32 This proposal received almost unanimous agreement from NGO groups. Reasons for this support were due to sugary soft drinks' poor nutritional value and their effect on dental erosion. There were comments that diet versions of soft drinks are also not healthy and erode teeth and therefore water should be more readily available instead.

- 3.33 Food industry representatives held different views to their NGO group counterparts with the majority considering free refills to not be a big problem when zero and low calorie options are so widely available. They felt that portion size restrictions may result in consumers simply buying more smaller portions.
- 3.34 **Q2.e Should the following settings be excluded from both the calorie labelling and soft drink restriction requirements?**
- i. schools and colleges
  - ii. early years and childcare settings
  - iii. hospital in-patients
  - iv. care homes and settings
  - v. charity sales
- 3.35 Delegates had mixed views on the exemptions. Those that agreed with schools, colleges, early years and childcare settings being excluded reasoned that there were already nutritional standards in place for these settings. Delegates commented that they understood why hospital in-patients and care home settings were excluded as the nutritional requirements for the people within these settings is often very individual. There was also sympathy with charity sales.
- 3.36 Those who disagreed with or were unsure about the exemptions tended to think that the legislation should apply regardless of the setting to avoid conflicting messages.

### **Theme 3: Healthier Local Food Environments**

#### **Q.3.a What support and measures could be put in place for local authorities to help improve the availability of healthier options within local areas?**

- 3.37 NGO groups, suggested a range of support and measures:
- awards, incentives and recognition for business that provide healthy options
  - more promotion of the Healthy Start Scheme

- involve the whole community in local projects such as growing spaces to produce fresh fruit and vegetables for nearby settings such as schools and hospitals
- further guidance and support for local authorities on good practice.
- legislation to ensure local authorities have plans in place to enable a healthy and sustainable food environment, similar to Scotland's Good Food Nation Act.

**Q.3.b What support could be offered to help local businesses increase the healthier menu options available and reduce the calorie content of their food?**

3.38 Responses focused on positive themes such as:

- access to free nutritional analysis, advice or training
- ensure professional chef training in Wales includes enough focus on healthy eating
- access to clear and consistent communications, standards and guidelines
- awards and other incentives.

**Q.3.c Should existing planning and licensing support, including guidance, be reviewed to address the distribution of Hot Food Takeaways (HFTs), particularly close to secondary schools and colleges?**

3.39 Delegates broadly agreed that existing planning and licensing support should be reviewed, with 83 per cent of participants in agreement. Those in agreement wanted to widen the scope of the review to include:

- mobile food outlets, especially near schools and college
- areas with an existing high density of hot food restaurants or few healthy alternatives.

3.40 Delegates suggested that unhealthy advertising near schools as well as the increasing availability of food delivery services will also need to be tackled. It was suggested that a reliance on takeaways is, in part, due to inadequate

food preparation spaces at home, so minimum standards are needed for all new build and rental properties.

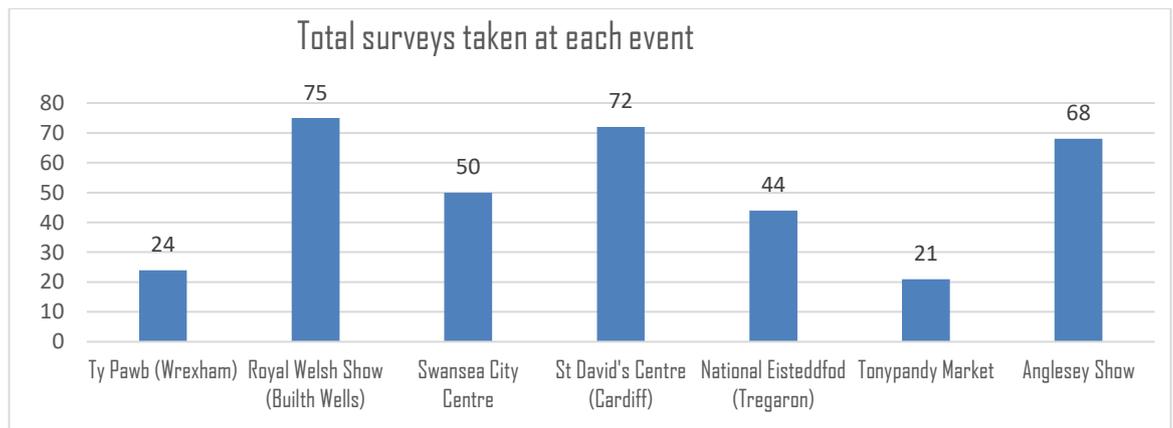
**Q.3.d What additional planning support and guidance could be provided to reduce the number of new HFTs near secondary schools and colleges?**

- 3.41 Delegates suggested that there is a need to understand why unsuitable planning requests are being approved. Every local authority will have different challenges, priorities and motivations. This knowledge can then be used to ensure that local authorities have the information and authority needed to make decisions that support healthy food environments. Some delegates thought that legislation would provide clarity and give local authorities more power. This legislation would need to be carefully monitored to make sure it is working across Wales. Delegates also suggested that healthy establishments need to be promoted alongside rejecting less healthy takeaways.
- 3.42 Finally, delegates felt that there should be an all Wales commitment to reduce the number of hot food takeaways linked to the Wellbeing of Future Generations Act. It should also be ensured that children and young people are given a voice in the decisions that affect them.

## 4. Public Engagement Roadshow: Survey Results

4.1 There were a total of 354 surveys taken at the seven events across Wales. Of these, only 17 were not completed fully. The partially completed survey results have been included within the data. The figure below shows the number of surveys taken per location. To note that the data for Swansea and Cardiff were combined, so the respective figures are approximate.

**Figure 1 Total surveys taken at each event**



### Theme 1: Healthier Shopping Baskets

#### Legislation restricting the promotion of HFSS products

4.2 Question 1: We want to introduce a law to stop promotions for less healthy foods that are high in fat, sugar, and salt. This includes:

- temporary price reductions (like this week's offer)
- multi-buy offers (like buy one get one free)
- volume offers (like meal deals)

Do you think this is a good idea?

Answer Choices	Responses		
Yes		78.51%	263
No		14.63%	49
Not sure		6.87%	23

4.3 There was a clear majority of respondents who believe stopping promotional offers on less healthy foods (those high in fat, sugar, and salt) is a good idea.

4.4 Those who answered ‘Yes’ believed this would have a positive impact on the health of our population, especially the younger demographic. One parent stated that they were in favour:

“Because it’s hard as a parent to convince children to make healthy choices when there are so many commercial products out there.”

4.5 However, the majority of the comments on this question came from those who answered ‘No’. The main reason stated was the cost of living and the reliance that some people have on promotional offers to keep their food spend down. Other comments suggested that the legislation would allow retailers to profit more. Meal deals were singled out by some:

“Meal deals are what people rely on. They’re cheaper, easier and less time consuming when working long, difficult hours.”

**Legislation restricting the placement of HFSS products**

4.6 Question 2: We want to stop less healthy foods being placed at store entrances, checkouts, aisle ends, or free-standing display units. Do you think this is a good idea?

Answer Choices	Responses		
Yes		84.73%	283
No		11.08%	37
Not sure		4.19%	14

4.7 There was a strong majority of respondents who believe moving less healthy foods away from ‘high-traffic’ areas is a good idea. The percentage is a little higher than those agreeing with restricting promotion of food high in fat, sugar or salt.

4.8 Those who answered “Yes” stated that this would reduce temptation, especially for children:

“Yes, parents struggle on a daily basis trying to fight children when it comes to food so why make it more difficult for them?”

4.9 For those who answered “No”, many thought that the responsibility should lie with the retailer, or the consumer to make decisions on what they buy.

Participants thought education, rather than legislation may be the answer:

“Personally, I go in with the right frame of mind to get a healthy food shop. We need the supermarkets on our side. Yes, they make money on it all, but let’s think of better and healthier alternatives.”

## Theme 2: Healthier Eating Out of the Home

### Calorie labelling requirements

4.10 Question 3: We want to have calorie labelling on food we eat out or buy from takeaways. Do you think this is a good idea?

Answer Choices	Responses		
Yes		71.73%	241
No		17.86%	60
Not sure		10.42%	35

4.11 Most respondents agreed with the proposal and believe calorie labelling should be included on menus.

4.12 Those who answered ‘Yes’ reasoned that giving people this knowledge would help people make better choices. It might make people have takeaways less often, or more aware of how the menu choices they are making fits in with their diet:

“Otherwise, it is impossible to really know how many calories are in what I am eating. It will help me make informed choices”

4.13 Those who answered ‘No’ commented that the proposal may pose a risk for people with eating disorders.

“Could be very triggering for eating problems such as eating disorders”

4.14 There was also concern that it would be too difficult for small businesses. There were several comments that portion sizes are not consistent in small independent businesses:

“Some takeaways like chip shops have different portions. How do you label something that is not constant”

**Proposed restrictions on the serving of sugary soft drinks**

4.15 Question 4: We want to stop free refills of sugary soft drinks. Do you think this is a good idea?

Answer Choices	Responses		
Yes		65.47%	218
No		24.92%	83
Not sure		9.61%	32

4.16 The majority of respondents agreed that free refills of sugary soft drinks should be stopped.

4.17 People who said ‘Yes’ often stated thought this was a sensible change as people should not need multiple drinks.

4.18 Other respondents thought that the proposal may be difficult to implement:  
 ‘How do you differentiate between people refilling sugar free soft drinks and high sugar soft drinks?’

4.19 For those that answered ‘No’, the most common reason was freedom of choice:

“People are responsible for their own choices and if they want to consume sugary drinks then that is their call.”

4.20 Question 5: Should we ban larger servings (over one pint or 570ml) of sugary soft drinks?

Answer Choices	Responses		
Yes		60.61%	200
No		25.45%	84
Not sure		13.94%	46

4.21 Once again, the majority of respondents agreed with the proposal that larger servings of sugary soft drinks should be stopped. The percentage of those voting ‘Yes’ was slightly lower than those agreeing with banning free refills.

- 4.22 For those agreeing, the reasons given were similar to the previous question – an individual should not need to drink more than 570ml in one serving.
- 4.23 Those disagreeing with the proposal argued people buying larger servings of soft drinks, especially bottles, may be intending to share with others. Other people argued that the proposal will not stop individuals overconsuming soft drinks as they will be able to purchase more than one serving at a time. Finally, some respondents commented that it should be people's freedom of choice what and how much product to buy, and that sugar free soft drinks could be promoted more as an alternative to legislation.

### **Theme 3: Healthier Local Food Environments**

#### **Support to be put in place to increase healthy options in local areas**

- 4.24 Question 6: We want to support local action to create communities where the healthy choice is the easy choice. How could we make town centres and local communities places which could help to support healthier choices?
- 4.25 There were 267 responses to this question. The responses included suggestions such as:
- Less advertising and promotion of unhealthy foods, with more promotion and support for healthier alternatives.
  - Local communities need to have the opportunity to shape the approach they want within their local area. Local people and businesses should be involved in decision making.
  - There should be less focus on legislation and more focus on education and teaching people how to live a healthy lifestyle.

#### **Limitations on the distribution of takeaways near certain settings**

- 4.26 Question 7: We want to limit the number of takeaways in towns and close to schools and colleges. Should we look at changing the way planning decisions are made to limit the number of takeaways in communities and close to secondary schools and colleges?

Answer Choices	Responses		
Yes		63.58%	213
No		22.69%	76
Not sure		13.73%	46

- 4.27 Most respondents answered that planning decisions should be reviewed to limit the number of takeaways.
- 4.28 Many of those answering 'Yes' thought that takeaways should be limited across towns and cities, and not just around schools and colleges. Some respondents commented that action was also needed to reduce the demand for takeaways. Suggestions included: improving the appeal and quality of school meals, educating children and young people about nutrition and supporting businesses that provide healthier options.
- 4.29 Question 8: What else would help make the healthy food choice the easy choice in your life?
- 4.30 There were 240 responses to this question. Many of the responses were similar to Question 6. Responses included:
- Schools should have a responsibility to teach children, and their parents, about healthy food choices
  - More healthy food options on the high street and in store with prices that are as least as competitive as the less healthy food.
  - More support for communities and local projects that encourage healthier lifestyles.

## **Annex A: Possible products captured by proposals 1 and 2**

Both options identify products classified as high fat, sugar or salt according to the Nutrient Profiling Model.

'Option A' lists products that are of most concern for childhood obesity.

'Option B' includes Option A items and additional products that are captured by the Sugar Reduction Programme, Calorie Reduction Programme and Soft Drink Industry Levy.

### **Option A – Categories that are of most concern for childhood obesity**

- Soft drinks
- Chocolate confectionery
- Sugar confectionery
- Cakes
- Ice cream
- Morning goods
- Puddings and dairy desserts
- Sweet biscuits
- Breakfast cereals
- Yoghurts
- Milk-based drinks with added sugar
- Juice based drinks with added sugar
- Pizza
- Crisps and savoury snacks
- Ready meals and meal centres including breaded and battered products
- Chips and potato products

**Option B – All products captured by the programmes.**

All products in Option A and additionally:

- Garlic bread
- Pies and quiches
- Bread with additions
- Savoury biscuits, crackers and crispbreads
- Cooking sauces and pastes
- Table sauces and dressings
- Processed meat products
- Pasta/rice/noodles with added ingredients and flavours
- Prepared dips and composite salads as meal accompaniments
- Egg products/dishes
- Sweet spreads