Legislating for a ‘health in all policies’ approach and health impact assessments

Dear Carl,

In response to the recent publication of the Stage 1 Committee Report by the Environment and Sustainability Committee on the Well-being of Future Generations (Wales) Bill we would, in particular, wish to express our welcome for recommendations 29 and 30 of the report which refer to the need for the Bill to be improved regarding its ability to deliver a ‘health in all policies’ approach.

As you may recall, the idea of introducing a ‘health in all policies’ approach was consulted upon favourably by the Welsh Government in 2012 as part of the then Public Health Green Paper. Your colleague, the Minister for Health and Social Services, subsequently indicated in his Ministerial foreword to the Public Health White Paper earlier this year that the approach would now be delivered through the Well-being of Future Generations (Wales) Bill. However, our view is that the concept is not sufficiently taken forward by the Bill in the way it has been initially drafted and we therefore welcome the fact that the Environment and Sustainability Committee has concluded it shares this concern.

In the Public Health Green Paper, the concept of a ‘health in all policies’ approach was described as testing “any new policy to assess its impact on health, in order to minimise any damage and increase any benefit it might cause”. We very much support such an approach to delivering ‘health in all policies’. We therefore hope that any amendments to the Bill you may now consider putting forward in response to recommendations 29 and 30 of the Stage 1 report will deliver a ‘health in all policies’ approach along the lines of this previously considered definition. Indeed, we would urge you to do so, thereby creating a statutory requirement for public bodies in Wales to assess any new policies for their impact on health.

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Listed as a Trade Union under the Trade Union and Labour Relations Act 1974.
In addition to supporting the introduction of a ‘health in all policies’ approach, BMA Cymru Wales also strongly supports the introduction of a statutory requirement for more rigorous health impact assessments (HIAs) in appropriate circumstances. HIAs were also consulted upon in the 2012 Public Health Green Paper, but were not subsequently mentioned in the more recent Public Health White Paper. The concept was also favourably received during that consultation, although with greater support expressed for HIAs to apply to Welsh Government and Welsh local authorities.

We note that the Minister for Health and Social Services recently expressed support for the use of HIAs by local authorities in making planning and licensing determinations. During a plenary debate on an update statement on the Public Health White Paper on 8 October, he indicated: "I would be very keen—I always have been—to be able to make the public health impact one of the considerations that local authorities are able to take into account in making planning and licensing determinations."

We therefore hope that – notwithstanding our desire, as expressed above, to see a ‘health in all policies’ approach properly brought forward within the Well-being of Future Generations (Wales) Bill – other legislative opportunities are also considered by the Welsh Government to additionally put HIAs on a statutory footing, whether in the forthcoming Public Health (Wales) Bill or the currently being considered Planning (Wales) Bill.

Yours sincerely,

Dr Stephen Monaghan
Chair, Welsh Council Legislation Subcommittee

cc: Mark Drakeford AM, Minister for Health and Social Services