

Cyflwynwyd yr ymateb hwn i'r ymgynghoriad ar y Bil Bwyd (Cymru) Drafft

This response was submitted to the consultation on the Draft Food (Wales) Bill

FB017

Ymateb gan: | Response from: Ymddiriedolaeth Genedlaethol | National Trust

National Trust Cymru is Wales' largest private landowner and proud to care for 46,000 hectares of land, 157 miles of coastline and 18 of the nation's finest castles, houses, gardens and industrial sites. With the support of our staff and volunteers, more than 1.8 million visitors enjoy our places in Wales every year.

We place great importance on the conservation, management and enjoyment of the natural and historic environment both within and beyond our boundaries and recognise the important contribution that agriculture has on the landscape.

We recognise that the environment needs us now more than ever and we are making landscape-scale improvements for nature and playing our part to tackle climate change. We are committed to becoming carbon net zero by 2030, restoring and creating 4,600 hectares of priority habitat by 2025 to reverse the decline in wildlife taking a joined-up approach to nature conservation and for all of our land to be of high nature status.

As a conservation charity, National Trust Cymru believes that a healthy natural environment underpins good food production. 97% of our land is classed as farmland in Wales, as is most of the land here. The evidence highlighted in the State of Natural Resources Report (SoNaRR¹) is now clear that Wales' natural resources are in poor condition. Sustainable, resilient food production requires healthy soils, clean water, and thriving nature. The intensification of agriculture over the past 50 years has had the biggest, overwhelmingly negative impact on natural resources and ecosystems in Wales, driven by market failure and a Common Agricultural Policy that historically supported unsustainable growth. In its degraded condition, land is now more vulnerable to the impacts of climate change.

The UK's first Food Security Report² concludes that "The biggest medium to long term risk to the UK's domestic production comes from climate change and other environmental pressures like soil degradation, water quality and biodiversity."

Response to consultation

¹ [Natural Resources Wales / State of Natural Resources Report \(SoNaRR\) for Wales 2020](#)

² [United Kingdom Food Security Report 2021: Theme 2: UK Food Supply Sources - GOV.UK \(www.gov.uk\)](#)

We support the view that ‘those that do not have a robust localised food system in place are often more vulnerable’ to increasingly frequent global shocks to the system. National Trust Cymru believes that farmers will continue to have a critical role in producing safe and sustainable supplies of food. Indeed, the future of farming is inseparable from the future of the environment, with a healthy environment vital for the sustainability of UK food production. We welcome the intention to seek join-up between the Food (Wales) Bill and the forthcoming Agriculture (Wales) Bill. We suggest that the proposed Food (Wales) Bill should aim to support the uptake of ‘Sustainable Land Management’ as defined in the Agriculture (Wales) Bill and measured against the goals of the Environment (Wales) Act 2016 and the Well-being of Future Generations (Wales) Act 2015.

We support the view that “food policy is too often thought of in silos, with Welsh Government departments taking different approaches to food policy; thus resulting in policy aims that can often contradict each other” and we welcome the proposal to ‘publish a national food strategy setting out the overall strategy and individual policies that they intend to pursue in order to advance the primary food goal and the secondary food goals, and achieve the food targets’.

With all this in mind, we suggest that the proposed Food (Wales) Bill should:

- **accurately acknowledge the degree to which farming in Wales is sustainable.** Currently this is low, according to evidence from, for example the SoNaRR II and Welsh Government’s Low Carbon Action Plan.
- **be clear about the level of sustainability that the policy seeks to achieve.** Given the escalating threats to food production arising from climate change, we suggest the goal should be to achieve a food system that is demonstrably sustainable, not just ‘more sustainable’ than the current.
- **use clearer terminology** – a ‘Local Food Plan’ is suggestive of short-supply chain / community food plans, although this is not necessarily what is intended.
- **ensure that the proposals fully address environmental sustainability.** We welcome the scope of the proposed Primary Food Goals but suggest that the Food Commission as proposed lacks representation from all key Food Goal areas, specifically environmental sustainability and public health. We are concerned that without this representation the Food Commission would not be well placed ‘to keep the public adequately informed about and advised in relation to matters which significantly affect their capacity to make informed decisions about food matters’ (40.c) or to advise Welsh Ministers on food strategy (64).
- **place a duty on Ministers to deliver** and not just set and review food strategy targets. In particular we believe that a duty must be placed on Welsh Ministers to seek advice from the Future Generations Commissioner on how to align the strategy with the sustainable development principle as set out in the Well-being of Future Generations (Wales) Act 2015.

We note that Wales does not have full control over all policy that influences the Primary Food Goals. These policy areas include UK trade policy, UK frameworks (for example the Internal Market Act and Organic Production Common Framework) and UK Government funding for Wales' agricultural support.

We believe that government and private sector support - through the food supply chain – is required to help deliver the types of land management that we need and for farming to support thriving rural communities. We would like to see all businesses across the supply chain enjoy good working relationships and secure a fair share of the profits, and for more transparent, local and shorter food supply chains. In this respect we welcome the proposed aim to provide 'a framework that enables a coherent, consistent and strategic cross-governmental approach to policy and practice on all aspects of the food system'.

We suggest that food goals should interact with local competition and planning requirements, necessary to support a fairer and more transparent system including more diverse and community-led retail. This is required to enable more farmers to obtain a fairer share of the price paid at the checkout, and to support consumer trust. Equitable trading between producers and retailers leads to a better balance of power between the two, unlike with major retailers where producers are generally price takers.

National Trust Cymru welcomes the opportunity to respond to the Draft Food (Wales) Bill consultation and we look forward to further engaging with the process in due course.
