

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

FB018

Ymateb gan: | Response from: WWF Cymru

1. Do you agree with the overarching principles that the Bill seeks to achieve?

We understand the overarching principles to be:

“The proposed legislation seeks to establish a more sustainable food system in Wales to strengthen food security, and improve Wales’s socio-economic well-being, and enhance consumer choice”.

WWF Cymru is very concerned that the overarching principles of the Bill are not strong enough on the environment. Firstly, aiming to establish a **more** sustainable food system, as opposed to a sustainable food system, could essentially imply ongoing (if reduced) unsustainable activity. **We would suggest that the wording for the principles in the Bill is more explicit on the need to both restore nature and mitigate and adapt to climate change in Wales. Instead of just reducing harm to the environment, Wales’ food system should contribute positively to the environment through promoting agroecological approaches.**

We know from highly respected scientific evidence bases like the State of Nature Report and the Welsh Government’s Low Carbon Action Plan that current methods of unsustainable land management, which largely include agricultural production, are the largest drivers of nature’s decline and a significant contributor to freshwater pollution and national carbon emissions in Wales. Unsustainable land management (and therefore food production) is the main reason why:

- Wales is now one of the most nature depleted countries in the World¹ with 1 in 6 species threatened with extinction².

¹ <https://www.rspb.org.uk/globalassets/downloads/about-us/48398rspb-biodiversity-intactness-index-summary-report-v4.pdf>

² <https://nbn.org.uk/wp-content/uploads/2019/09/State-of-Nature-2019-UK-full-report.pdf>

- None of our ecosystems (including soils, air and water), essential to our well-being, are resilient³. Most of our soils (except for woodlands) are in poor condition and almost all our water bodies are impacted by agricultural pollution, including all our SAC rivers⁴.
- Agriculture contributes nearly 14% of Welsh greenhouse gas emissions⁵, much of it methane from livestock, and agricultural emissions have been rising in Wales over the last decade. This figure is higher when considering the wider food supply chain, including imported animal feeds⁶

The UK's first Food Security Report concluded 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". We will be unable to produce nutritious food in the amounts that we need to sustain our population and that of future generations if we do not rise to the challenge we face on climate change and environmental degradation.

An embedded analysis provided by the Stockholm Resilience Centre⁷ concludes that everything is ultimately dependent on a healthy environment. Without it our society, economy and culture are not resilient. The Stockholm Resilience Centre conclude that all the sustainable development goals are directly or indirectly connected to sustainable and healthy food. They conclude that economies and societies should be seen as embedded parts of the biosphere, and a vision is needed to move away from the current sectorial approach where social, economic, and ecological development are seen as separate parts. The Well-being of Future Generations Act gives us the ambition, permission and legal obligation to improve our social, cultural, environmental and economic well-being. And importantly, in goal 2 of the Act it is clear that maintaining and enhancing a biodiverse natural environment with healthy functioning ecosystems is crucial to supporting social, economic and ecological resilience and the capacity to adapt to change. This is also highlighted in our Food System fit for Future Generations report⁸. We believe this evidence should be recognised in development of the Food Bill.

We also believe that the Bill needs to be **more explicit in considering Wales' global responsibility**. In other words, it is essential that the impact of Wales' food system beyond Wales is also considered and that future food legislation and policy serves to eliminate unsustainable practises here and overseas. Wales and Global Responsibility⁹, a report by WWF, RSPB Cymru and Size of Wales found that:

An area nearly half the size of Wales was required overseas to grow Welsh imports of cocoa, palm, beef, leather, natural rubber, soy, timber, pulp and paper in an average year between 2011- 2018, causing deforestation, habitat conversion, greenhouse gas (GHG) emissions, and risking exploitative labour practices.

Considering the above commodities, it is clear that Wales' food sector has a large overseas deforestation and habitat loss footprint. Based on the points raised above we recommend the principles for the draft Bill are broadened to include the need for our food system in Wales to play a crucial role in **restoring nature and mitigating and adapting to climate change in Wales and**

³ <https://naturalresources.wales/evidence-and-data/research-and-reports/state-of-natural-resources-report-sonarr-for-wales-2020/?lang=en>

⁴ Tackling Phosphorous Pollution in Wales' Special Area of Conservation Rivers. Welsh Government, 2022.

⁵ [Advice-Report-The-path-to-a-Net-Zero-Wales.pdf \(theccc.org.uk\)](#)

⁶ https://www.wwf.org.uk/sites/default/files/2021-11/wwf_risky_b_wales.pdf

⁷ [Planetary Boundaries - an update - Stockholm Resilience Centre](#)

⁸ [A WELSH FOOD SYSTEM FIT FOR FUTURE GENERATIONS | WWF](#)

⁹ [wwf_risky_b_wales.pdf](#)

overseas. This would ensure future food systems contribute fully to addressing the *Nature and Climate Emergency* and are aligned with and contribute to the aims of the Well-being of Future Generations (Wales) Act 2015, including Goal 2, a Resilient Wales:

A nation which maintains and enhances a biodiverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for example climate change).

And Goal 7, a Globally Responsible Wales:

A nation which, when doing anything to improve the economic, social, environmental and cultural well-being of Wales, takes account of whether doing such a thing may make a positive contribution to global well-being.

Building on the above, we note that the consultation document states “*The food system is central to Wales’ current and future socio-economic prosperity*”, and would question why this does not recognise the importance of the environment to prosperity. We note in this response above the importance of the direct links between the food system and the environment, and would also point to the importance of the environment in the definition of the ‘Prosperous Wales’ goal in the Future Generations Act, described as “An innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change)”.

We also note that food security is a key overarching principle of the bill. We believe that the concept of food security does not distinguish where food comes from or how it is produced and distributed. Contrary to the concept of food security, how and where food is produced and consumed matters to the concept of food sovereignty. Food sovereignty emphasizes ecologically appropriate production, distribution and consumption, social-economic justice and local food systems as ways to tackle hunger and poverty and guarantee sustainable food security for all peoples.

We believe that food sovereignty (not to be confused with self- sufficiency) is a more helpful concept and political ambition for Wales’ current needs. The concept of food sovereignty aligns well with the principles of agroecology. Crucially, from a biological perspective, agroecological systems optimize diversity in agricultural systems – and we have a lack of diversity in the foods we produce in Wales with dairy, beef and lamb production making up more than three quarters of Welsh domestic food production. The vast majority of what is produced is not consumed in Wales and so in rebalancing diets and in meeting Welsh Governments commitment in Net Zero Wales Carbon Budget 2 to promote a dietary shift in line with the Eatwell diet, we should be addressing the need for more diversity in our food production across Wales in line with climate-friendly and healthy diets. We need to be considering both what we eat and how we produce it, and how we better link production and consumption in Wales.

Given the above, if we are serious about developing a holistic and joined approach to our food system, the environment needs to form a key part of the principles within the bill. WWF Cymru will not be supporting this Food Bill unless the environment becomes more of a central component within it. We believe that it is vital that this draft Bill, should it become law, is an effective means of developing a nature and climate friendly food system for Wales, both in terms of production and the consumption of food. **As well as being more explicit on the need to restore nature and mitigate and tackle climate change both in Wales and overseas, we believe that agroecological principles should be what underpins the bill,** as those principles cover environmental, economic, social and

cultural considerations, and will ensure true resilience within our food system (more on this in questions below).

2. Do you think there is a need for this legislation? Can you provide reasons for your answer.

There is a need for legislation in this remit to ensure governance and accountability. We welcome both the bill and this consultation. The former because it brings forward a meaningful framework and accountability measures to enable a proactive approach, determining how we want our food system to work, rather than just dealing with the consequences. And the latter because it offers the opportunity to strengthen that proposed framework in ways which are essential if it is to result in coherent and comprehensive policy that will achieve the goal of delivering a food system fit for future generations. This Bill, if designed correctly, offers the potential to bring forward a meaningful framework in which to develop the policies, strategies and actions we need to deliver a food system fit for future generations. We very much welcome the Bills recognition of the need for a coherent, consistent and strategic cross-governmental approach to food. This is coherent with the analysis presented in our Food System Fit for Future Generations report¹⁰.

It is our view that the Wales Food Bill's primary aim should be to provide a legislative framework that enables policy coherence across the food system guided by agroecological principles. Further, we would recommend including a "Purchase Clause" to ensure the Bill takes account of the many aspects of the food system. A suggested 'Purpose Clause' text put forward by Food Policy Alliance Cymru (of which WWF Cymru are members) states:

"The Food (Wales) Bill is designed to create a new system of governance that drives a food system approach to achieving a healthier, sustainable and just food system for current and future generations in Wales by strengthening food sovereignty, restoring and maintaining biodiversity, mitigating and adapting to climate change and improving Wales's environmental, social and economic well-being. A National Food Commission, led by a Commissioner is tasked to oversee and deliver a co-produced National Food System Vision and Roadmap that aligns with agroecological principles and includes an action plan for achieving set targets. The Food Commission will collaborate with Ministers to ensure that new strategies and policies align and are integrated with established policies and strategies to provide that every person has access, in a dignified and culturally appropriate manner, to nutritious, sustainable and safe food at all times (prevention). In doing so, the Food (Wales) Bill integrates the five ways of working mandated by the Well-being of Future Generations Act".

Its also crucial to highlight that as well as producing new legislation, it is vital that this legislation links with and takes account of already existing legislation in Wales. The draft Bill does mention alignment to other pieces of legislation/policy such as the Community Food Strategy, Agriculture Bill and Social Partnership Bill. However, it has omitted reference to how it would interface with the Environment (Wales) Act, the Public Health (Wales) Act, national and local planning policies, and to provide sufficient detail on the relationship between the Food Bill and the Well-being of Future Generations Act (as mentioned throughout this response).

¹⁰ [A WELSH FOOD SYSTEM FIT FOR FUTURE GENERATIONS | WWF](#)

Aligning to the Environment (Wales) Act in particular is crucial, as the objectives of the Bill should be aligned to, for example, our net zero targets and the biodiversity and resilience of ecosystems duty placed on public authorities in the Environment (Wales) Act.

It is noted that the objectives of the draft Bill complement those of the Sustainable Farming Scheme and together “they will help to make high quality ethically sourced local food more readily available in Wales, while supporting our farmers to keep farming sustainably.” This is welcome. We would point out however that if the Food Bill is to compliment the Agriculture Bill and Sustainable Farming Scheme, the Food Bill needs to strengthen its environmental principles in order to align with the Sustainable Land Management objectives set out in the Sustainable Farming Scheme. The Sustainable Farming Scheme will support farmers to produce food in a sustainable manner, mitigate and adapt to climate change and maintain and enhance the resilience of ecosystems and the benefits they provide in order to deliver Sustainable Land Management objectives, alongside a number of supply chain opportunities. In turn, this Food Bill could further help to support the development of agroecological farm-to-fork local food supply chains. This includes the Bill enabling, through strategic national and local food plans, support for local infrastructures such as the set-up of food hubs, community supported agriculture and public procurement to create demand and local markets for food produced in line with Sustainable Land Management objectives. Thus could be enabled through ensuring food policy is joined up through the national and local food plans.

Considering the Well-being of Future Generations (Wales) Act 2015, there is some alignment in the draft Bill to public body duties in the Future Generations Act, with intentions to use the Future Generations Act to facilitate a more coherent approach to the development of food policy in Wales. This is welcome, especially given our work to date on global responsibility and the evidence and analysis provided in our Wales and Global Responsibility report. In seeking to develop a resilient and sustainable food system, we must consider and tackle not just the impacts of Wales’ food system in Wales itself, but also the impact of Wales’ food system overseas. Currently, a significant amount of food consumed in Wales is imported from countries and regions with a high risk of tropical deforestation, habitat conversion and social impacts e.g., the abuse of Indigenous Peoples rights and forced and child labour. This includes commodities such as beef from South America, soy and palm oil used as livestock feed in Wales, palm oil for human consumption, coffee and cocoa. ¹¹[~~08~~] shows:

- Wales’ imports 190,000 tonnes of soy a year. Soy is mostly imported into Wales in the form of meal and beans for livestock feed. The Welsh poultry industry is estimated to be responsible for consuming 48% of Wales’ imported soy feed for livestock, followed by dairy (20%) and sheep (19%). Nearly three-quarters of the soy import land footprint falls in countries that are high or very high risk for deforestation and/or social issues, including Paraguay, Brazil, and Argentina. Greenhouse gas emissions from land use change, such as deforestation, for growing Welsh imports of soy total over 1.1 million tonnes of CO₂e each year.
- Palm is mostly imported into Wales in the form of palm kernel expeller and oilcake (53% of total), which is an ingredient in livestock feed. A further 27% of imports are palm oil, which is used in many processed foods, such as biscuits, cakes and confectionary, and personal hygiene products (e.g., soap). Welsh palm imports total 51,000 tonnes a year 37% of the palm Wales imports is grown in Indonesia, where land use change associated with its production totals 168,500 tonnes of CO₂e each year. 85% of the palm import land footprint falls in countries that are high or very high risk for deforestation and/or social issues,

¹¹ [Wales and global responsibility | WWF](#)

including Indonesia, Malaysia, and Papua New Guinea. This makes palm the highest risk commodity that Wales imports.

- Most beef imported into Wales is fresh or chilled (53%). The rest is frozen or in processed meat products such as corned beef. Welsh imports total 12,000 tonnes of beef equivalent each year. Welsh beef imports require a land area the size of the Brecon Beacons every year. 26% of the beef import land footprint falls in countries that are high risk for deforestation and/or social issues, including Brazil and Australia. Welsh imports of beef account for 5% of the UK's total beef imports, which is comparatively high considering Welsh share of UK GDP and population. Wales has a higher proportion of its beef land footprint in Brazil compared to the rest of the UK (15% of total versus 12%). This is due to higher levels of corned beef consumption in Wales, which nearly always comes from Brazil.
- Welsh annual imports of cacao total 15,000 tonnes. Greenhouse gas emissions from land use change associated with the production of cocoa for Welsh imports total 68,800 tonnes CO₂e each year. Wales imports the majority of its cocoa from West African countries, where there are risks of deforestation and social issues, such as child labour. Welsh consumption of cocoa products is slightly higher per capita than the rest of the UK.

Unsustainable production of these forest-risk commodities is not only driving climate change and biodiversity loss, but it is also increasing the risk of future pandemics. Please see more throughout in our response highlighting how we believe the draft Bill could be better aligned with the Well-being of Future Generations Act, and how we believe the draft Bill needs to be more explicit in tackling global responsibility.

3. Please provide your views on the inclusion of the Food Goals within the Bill as the means to underpin the policy objectives.

We support the idea of 'Food Goals', and believe that Food Goals should appear on the face of the bill and be aligned as much as possible with the Well-being goals set out in the Future Generations Act in order to help stimulate immediate action and help in measuring progress (e.g. through setting of Wellbeing Objectives).

However, in the draft text we feel the primary goal is weak in its definition, giving it would be the primary focus of the legislation. We urge the team to put more definition in at this higher level to avoid ambiguity – for example, we couldn't support more food production at the degradation of our environment and wellbeing. We would like the primary goal to be explicit on the need to restore nature and mitigate and tackle climate change in Wales and overseas, and the crucial role that the food system needs to play in enabling this, and we believe that agroecological principles should underpin the primary goal.

As noted above, it is our view that the Wales Food Bill's primary aim should be to provide a legislative framework that enables policy coherence across the food system guided by agroecological principles. We would recommend including a "Purchase Clause" to ensure the Bill takes account of the many aspects of the food system. A suggested 'Purpose Clause' text put forward by Food Policy Alliance Cymru (of which WWF Cymru are members) states:

"The Food (Wales) Bill is designed to create a new system of governance that drives a food system approach to achieving a healthier, sustainable and just food system for current and future generations in Wales by strengthening food sovereignty, restoring and maintaining biodiversity,

mitigating and adapting to climate change and improving Wales's environmental, social and economic well-being. A National Food Commission, led by a Commissioner is tasked to oversee and deliver a co-produced National Food System Vision and Roadmap that aligns with agroecological principles and includes an action plan for achieving set targets. The Food Commission will collaborate with Ministers to ensure that new strategies and policies align and are integrated with established policies and strategies to provide that every person has access, in a dignified and culturally appropriate manner, to nutritious, sustainable and safe food at all times (prevention). In doing so, the Food (Wales) Bill integrates the five ways of working mandated by the Well-being of Future Generations Act".

4. Do you agree with the inclusion of a Primary Food Goal supplemented by Secondary Food Goals?

Yes, in principle we support the idea of a Primary Food Goal which is supported by the delivery of Secondary Food Goals – but see our comments below for how we think these could be better aligned to needs, and could reduce the risk of action being siloed.

5. Are there additional / different areas you think should be included in the Food Goals?

The secondary food goals outlined in the consultation are sectoral and work against the need to take an integrated approach to the food system. Along with our partners in Food Policy Alliance Cymru, we have suggested alternative Food Goals, targets for which would be set by the Commission.

1. Food for all

Wales becomes the first nation to eliminate the need for food banks. Everyone in Wales has access to the food they need in a dignified way, in order to live a healthy life.

Target: Zero food banks in Wales by 2030

2. Food for public health

Increased consumption of vegetables, which are produced sustainably in Wales for Wales.

Educational provision on food related issues in each key stage in all schools.

Target: 75% of Eatwell's recommended vegetable consumption is produced sustainably in Wales by 2030

Target: 100% of schools including food in Key stage 1-3 curriculum

3. Net zero food system

A net zero food system for Wales.

Target: Net zero emissions from Wales' food system by 2035.

4. Farming for nature and climate

Increased amount of agro-ecological production.

Measure the environmental footprint of food at home and overseas and set a target to reduce the environmental footprint of food production and consumption.

Target: 100% agroecological production by 2035

Target: 75% reduction in environmental footprint of food production and consumption at home and overseas by 2035.

5. Sustainable food procurement

Increased public procurement of food from organic or agroecological Welsh producers. Strategies for ensuring adequate supply and fit-for-purpose dynamic procurement tools should be addressed in the roadmap.

Target: 30% of public procurement of food is from organic or agroecological Welsh producers by 2030

6. Sustainable food sector jobs and livelihoods

Those who earn their living within the food system receive, or are enabled to receive, at least the living wage or a fair return for their work. Work, whether on land or sea, is free from exploitative practices, and is varied, engaging and empowering. Achieving cannot be achieved by focussing solely on individual businesses or by simply mandating higher wages, but requires analysis of the market structure in the food system that leads to low wages in farming and the food sector.

Target: 100% of food sector jobs paid the real living wage by 2030

Each of the above goals represents an integrative piece of work and relies on collaboration between Ministers and government departments to achieve a coordinated approach. This coordinated approach should be overseen and mediated by the Food Commission, whereas each Minister will have a duty to collaborate to work to reach targets.

Its important to note that these goals align with, and are guided by, agroecological principles which come with a wealth of benefits, for the environment (in Wales and overseas), the economy, our health, access to affordable food and, overall better resilience within our food system.

Please note that goal 2 covers the need to enable affordable, healthy and sustainable diets for Welsh citizens. Promoting and enabling dietary change is a key component to food system change, enabling a more resilient food system that if designed right could deliver for the environment, our health and economy.

Goal 3 would include the need to tackle food waste. Tackling food waste will be crucial in helping to reduce costs. Food production uses vast amounts of resources, including land, water and energy, and huge gains can be made, both environmental and financial, by reducing waste. A good example of this is the Copenhagen model, where almost 90% of the food sourced for municipal meals is

organic and all within the same budget, thanks to investment in training and food storage improvements in public kitchens, as well as joined-up working between food producers and the city administration.

It's important to note that goal 4 would address the overseas environmental and social impacts of Wales' food system.

6. Do you have any additional comments on the Food Goals, including the resource implications of the proposals and how these could be minimised?

If the draft Food (Wales) Bill does become legislation, further funding may need to be made available for local organisations such as Local Authorities and Health Boards in order to be compliant with the primary and secondary food goals.

7. Please provide your views on the inclusion of targets within the Bill as the means to measure how the Food Goals are being advanced.

We welcome the inclusion of targets and we know that specific targets can help stimulate immediate action and help in measuring progress. We look to the Environment (Wales) Act to provide a useful example of how targets on climate change are included to embed scrutiny within the legislation and encourage an emphasis on progress. The Wales Food Bill would benefit from having ambitious targets on the face of the Bill to drive action and align with the Well-being of Future Generations Act.

Please see our answer to question 5 which outlines what those targets should look like.

8. Do you agree with the process for setting the targets?

The process for setting the targets should be led by the Food Commission in co-production with food system stakeholders. The commission should be tasked with recommending targets from the co-production process to the Ministers for approval.

9. Do you think the reporting mechanisms set out in the draft Bill provide sufficient accountability and scope for scrutiny?

Yes - in principle. There just needs to be sufficient ability to provide feedback, and for things to be adjusted and tweaked should it be required. The mechanism for doing this should be, as you suggest, through the commission and through Welsh Government ministers.

10. Do you have any additional comments on the targets, including the resource implications of the proposals and how these could be minimised?

No

11. What are your views on the need for a Welsh Food Commission?

We see this as a critical element of the Bill. The set up of a Wales Food Commission was one of the key recommendations in our Food System Fit for Future Generations report¹². Like the draft text alludes to, this needs to be well resourced and efficient but it must allow external support to come in and help guide and shape direction. It should be as independent as possible.

¹² [A WELSH FOOD SYSTEM FIT FOR FUTURE GENERATIONS | WWF](#)

The proposed Food Commission should outline a set of principles to ensure that it will align to the principles and goals of the Well-Being of Future Generations (Wales) Act 2015. This includes the:

- Welsh Government's Well-Being Objectives;
- Five Ways of Working; and,
- Sustainable Development Principle.

In addition, the Bill proposes that the Food Commission provides advice, scrutiny and reviews the performance of public bodies and the Welsh Government in relation to food goals. The Bill should go further and outline that it will consult with the Auditor General and Future Generations Commissioner to ensure alignment with their advisory, monitoring and accountability functions in relation to the Well-Being of Future Generations Act. For example, the Food Commission should coordinate advice, scrutiny, monitoring and accountability for public bodies around food goals with the work of the Auditor General and Future Generations Commissioner in relation to their functions to support and monitor public bodies' well-being plans.

A set of principles that guide the actions of the Commission is needed. As everyone is a consumer, this means engaging with the wider public in the process, for example through citizen assemblies, and ensuring that the resulting vision reflects the identified priorities and builds upon their lived experiences. In this way, we also support the development of food citizens and the need to build stronger and more empowered communities and to ensure a Wales Food System Strategy that is co-produced.

The Food Commission should hold responsibility for carrying out the process of co-production (collaboration and involvement) to develop the Wales National Food Strategy, from the ground up. In light of the five ways of working of the Well-Being of Future Generations Act, including involvement, integration and collaboration, there is a legal mandate to engage with as wide a range of actors within the food system as possible to build the National Food Strategy. The Commission would present a draft Strategy, based on co-production principles, to Welsh Ministers for approval.

The requirement for integration and collaboration means that public bodies and Ministers need to work together to seek synergies and align policy across departments in support of its vision of well-being for current and future generations– this is what the Food Bill should seek to do for food-related policies, based on the co-produced Wales National Food Strategy. The Food Commission's role should be navigate the process of integration of food-related policies across Ministers' portfolios and Welsh Government departments.

The Food Commission's role should be navigate the process of integration of food-related policies across Ministers' portfolio. A Food Commissioner, rather than a Chair of the Food Commission, would carry the responsibility for navigating this process, as it requires a strong lead to negotiate integration of policies.

12. Do you agree with the goals and functions of the Welsh Food Commission? If not, what changes would you suggest?

Please see above

13. Do you agree with the size of the membership of the Food Commission and the process for appointing its members?

There is a need to ensure that the commissions membership does not include just the usual suspects. There needs to be a mechanism that ensures a good range of voices and diversity are represented on the commission.

14. What are your views on the proposal that the chair and members can serve a maximum term of five years and that an individual may be re-appointed as a chair or member only once? Do you believe this is appropriate?

The re appointment of a chair/member only once will ensure new individuals with different experiences are appointed to shape the commission as it evolves. We also have to ensure the commission is not a heavily handled top-down approach that will just be represented by the usual suspects.

15. Do you have any additional comments on the Food Commission, including the resource implications of the proposals and how these could be minimised?

No

16. Do you agree that there is a need for a national food strategy?

We very much welcome that the draft Bill intends 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. A national food strategy, in our view, could be core to achieving this joined up approach.

As rightly noted in the bill, 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 (please see examples of this in the answer to question 17). As highlighted in the evidence from our 'A Welsh Food System Fit for Future Generations' report, the Food and Drinks strategy 'does not provide a comprehensive Welsh food system strategy for the present and future generations'. We cannot deal with agriculture alone and not the other parts of the food system. We have to deal with food production, consumption and everything else in between in a joined-up manner if we want to ensure that one policy in one food area doesn't have unintended consequences for another food area.

A clearly articulated overarching National Food Strategy needs to connect with policy across departments that can support its delivery. A food systems approach provides an ideal opportunity to integrate sectors and demonstrate a system that can deliver a wide range of benefits under each of the Well-Being of Future Generations Act seven well-being goals, and apply the sustainable development principle when thinking of the long term, prevention, integration, collaboration and involvement. We also agree that public bodies have been found to have very different and inconsistent attitudes towards food policy within their own remit.

We believe that the national food strategy should be guided by agroecological principles. Strengthening the overarching principles of the bill, as well as the primary and secondary goals of the bill, to ensure they are guided by agroecological principles, will, in our view, enable the development of a more coherent and effective national food strategy that delivers environmentally, economically, socially and culturally.

17. Do you believe the Welsh Government's current strategies relating to 'food' are sufficiently joined up / coherent?

As rightly noted in the bill, 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. Below are just some examples on the lack of join up and a coherent approach to food policy in Wales:

- the strategic direction of growth and industrialisation, as laid out in the KPIs for growth in the 'vision' for the Welsh food and drink sector, which is at odds with sustainability objectives (for example climate change targets, the restoration of ecosystems, Welsh Government's commitment at COP 26 to do everything within their power to ensure Wales does not deforest the planet as a result of our supply chains and sustainable land management objectives in the Sustainable Farming Scheme)
- minimum alcohol pricing as part of the Public Health (Wales Act) vs the support and promotion of companies producing alcohol;
- a failure to connect Welsh Government's Food Retail Plan with opportunities within the Public Health Act - in particular around the Healthy Food Environment.

18. Does the draft Bill do enough to ensure that Welsh Ministers take advice and consult on the strategy before it is made. If no, what additional mechanisms would you put in place?

Any National Food Strategy should be developed in co-production with key food system stakeholders, led by the commission, which then can advise the Ministers on the outcome of the process. The advice given and the final strategy should be a transparent process.

19. Do you think the provisions of the draft Bill relating to reporting on the national food strategy are sufficient? If not, what changes would you like to see?

We would like to see it made explicit that there would be reciprocal and good communication and support between a food commission and local food partnerships, to ensure that there is consistent and even progress at a local level. Other relevant commissioners (e.g. Future Generations Commissioner), must be consulted as opposed to 'may be consulted'.

20. Do you think the provisions of the draft Bill relating to reviewing of the national food strategy are sufficient? If not, what changes would you like to see?

21. Do you have any additional comments on the National Food Strategy, including the resource implications of the proposals and how these could be minimised?

22. Do you agree that there is a need for local food plans?

Yes. We need to work out how they become a priority for the public bodies, and how the process for developing and evolving these plans is properly resourced.

23. Does the draft Bill do enough to ensure that public bodies consult on their local food plans before they are made. If no, what additional mechanisms would you put in place?

There is a need for local food plans to ensure plans are relevant to the local area. The draft Bill does not yet set out enough detail to ensure the public bodies consult widely on their local food plan. Any such plan has to be shaped in partnership with key local stakeholders including local businesses, farmers, producers, NGOs and the communities it may have an impact on. The language uses the

terms 'may consult' which does not go far enough to ensure the local food plan is developed in true partnership with the public body and the communities they serve.

24. Do you think the provisions of the draft Bill relating to reporting on the local food plans are sufficient? If not, what changes would you like to see?

We would like to see it made explicit that local food plans can be developed and delivered via local food partnerships.

Taking the Well-being of Future Generations Act Wales as an example, reporting alone does not mean there will be decisive action across each of the goals. What are the consequences if a public sector body fails to act? There should be a minimum requirement to ensure progress is made.

25. Do you think the provisions of the draft Bill relating to reviewing of the local food plans are sufficient? If not, what changes would you like to see?

26. Do you have any additional comments on local food plans, including the resource implications of the proposals and how these could be minimised?

Local food infrastructures need rebuilding. To support local supply chains and rebalance the distribution of power, infrastructure is needed in towns and the countryside to link food producers to consumers in more diverse ways. This means more sites for food markets, community retailers and food processors, investment in food cooperatives and the development of a network of food hubs that aggregate and distribute local food. Local authorities should be required to make plans for developing food hubs, which could facilitate local and regional provisioning and procurement for the public sector as well as private buyers.

Local and regional public procurement – for example in schools, hospitals and council offices – can help create markets for local food businesses. Public Service Board Well-being Plans should include public value criteria around environmental, welfare and nutritional standards in food production. Other policies developed by local authorities, NRW and other PSB members, including planning, procurement, education and others should be reviewed to ensure coherency with the Local Food Plans. For example, local development plans and planning policy should be amended to ensure it supports sustainable local food production; but prevent ecologically harmful agricultural development.

27. Do you agree with the list of persons defined as being a 'public body' for the purpose of this Bill?

28. Do you have any views on the process for making regulations set out in the Bill?

29. Do you have any views on the proposed commencement date for the Act?

