

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

FB019

Ymateb gan: | Response from: RSPCA Cymru

RSPCA Cymru welcomes the opportunity to respond to this consultation on Peter Fox MS' proposals for a draft Food (Wales) Bill.

We also welcome the opportunity to input into plans for a Member-led legislative proposal; and have been pleased to engage with Members from across the Senedd chamber during recent ballots for Member-led legislation over the Sixth Senedd via our #LawsForPaws proposals. This has seen four RSPCA-backed proposals for laws entered into ballots - concerning issues as diverse as glue traps, snares, pets in housing and formal powers for RSPCA inspectors.

DO YOU AGREE WITH THE OVERARCHING PRINCIPLES THAT THE BILL SEEKS TO ACHIEVE?

The RSPCA welcomes any attempt - legislative, policy or otherwise - to establish a more sustainable food system in Wales; and believes improving animal welfare should be at the heart of this Bill and this area of policy.

Indeed, the RSPCA believes food policy in Wales offers a central vehicle to promote higher animal welfare choices, make more information available to consumers and encourage those to make efforts to improve the welfare provenance of food.

Increasingly, welfare provenance is a key consideration for consumers, while animal welfare science has advanced significantly in recent years - so, the RSPCA believes, that factoring welfare choices into their decision-making would be an expectation much of the public would place on public bodies. Indeed, public bodies are well placed to lead a transition to higher welfare food and such options becoming more commonplace in society - so including a focus on welfare within the duties placed on public bodies is a key focus for the RSPCA when considering the principles of this legislation, and responding to this consultation.

The Bill is concerned with sustainability - and unless there is a significant change to our diets, we are likely to see an unsustainable rise in the number of animals (particularly fish and chickens) farmed for their meat over the coming decades in Wales, and across the UK. This will place even greater pressure on already stressed environments, natural habitats and scarce resources as well as the negative impacts on animal welfare of more animals being farmed, potentially in intensive systems. As such, to counteract these impacts, a reduction in the number of farm animals and a societal move to eating less meat from higher welfare systems, such as [RSPCA Assured](#), will be key. Indeed, a recent review by Henry Dimbleby for the UK Government recommended a 30 percent reduction in meat consumption over the

next decade¹. This followed the UK Government's Climate Change Committee stating that the amount of meat we eat must be reduced by 20-50 percent in order for the UK to reach net zero by 2050; while pledges for a reduction in meat consumption features regularly in the All Wales Plan 2021-25 '[Working Together to Reach Net Zero](#)'².

This consultation comes at a pertinent time - following the recent publication of the [UK Government's Food Strategy](#), after Dimbleby was commissioned to undertake the aforementioned review in 2018.

It also comes at a time when the Welsh Government is taking forward proposals for its Agriculture (Wales) Bill. Following campaigning by the RSPCA, the Welsh Government recently announced proposals for its new Sustainable Farming Scheme for Wales, which the Bill will pave the way for. This proposes to help "farmers make sure animals have a good quality of life" and "recognise and reward high animal welfare standards which take into account the animal's physical welfare as well as their wellbeing". Crucially, incentives will hinge on animals having "opportunities for positive experiences which allow them to have a 'good life' rather than simply removing factors that have a negative impact on them"³. This marks a welcome move away from historic agricultural policy in Europe - such as the legacy of the Common Agricultural Policy, first implemented under the Treaty of Rome in the early 1960s, with its focus on increasing food production in a way that intensified farming, with the result being contrary to good animal welfare standards; but the proposals should be backed up by a robust, ambitious Food Strategy.

There is clearly scope for Wales' food policy and the new duties being placed on public bodies proposed by this legislation to work in tandem with this policy intention of incentivising farmers to deliver the highest welfare standards. This Bill's overarching principles - with animal welfare at their heart - could play a key role in achieving that.

PLEASE PROVIDE YOUR VIEWS ON THE INCLUSION OF THE FOOD GOALS WITHIN THE BILL AS THE MEANS TO UNDERPIN THE POLICY OBJECTIVES.

ARE THERE ADDITIONAL / DIFFERENT AREAS YOU THINK SHOULD BE INCLUDED IN THE FOOD GOALS?

DO YOU AGREE WITH THE PROCESS FOR SETTING THE TARGETS?

The introduction of food goals will place clear, consistent duties on public bodies to advance the provision of affordable, healthy, and economically and environmentally sustainable food - namely, the Welsh Ministers, the local authority and local health boards - and, presumably, set benchmarks for reporting and public scrutiny.

However, the RSPCA would wish to see **the promotion of animal welfare** included as a secondary goal within the legislation. Through their procurement practices, public awareness work, via education and so much more, the public bodies listed by this legislation are well placed to create opportunities to provide higher welfare alternatives; and to promote their existence to the communities they represent. As such, should this legislation progress, the RSPCA hopes promoting the welfare of animals will be added as a secondary goal, alongside economic well-being, health and social, education, environment and food waste.

We believe this would be in line with the public's wishes. Indeed, polling for RSPCA Cymru has previously found that 80 percent of adults say that animal welfare standards are important in their

¹ National Food Strategy - An independent review for the UK Government

² All Wales Plan 2021-25 - Working Together to Reach Net Zero, April 2022

³ Welsh Government - [Sustainable Farming Scheme Outline Proposals for 2025](#)

purchasing decisions⁴. In a similar vein, Eurobarometer surveys show that 62 per cent of the British public do not feel animal welfare receives adequate importance in UK food policy⁵. The RSPCA's new [Animal Kindness Index](#) found 66 percent of UK adults consider animal welfare standards in their dietary choices; while one third of people have reduced or stopped eating meat in the past year to help animals. Clearly, consumer demand exists for increased access to higher welfare produce.

In terms of target setting, the legislation's focus on seeking advice from independent experts is welcome - but the RSPCA would highlight the importance of this including organisations with dedicated animal welfare expertise.

WHAT ARE YOUR VIEWS ON THE NEED FOR A WELSH FOOD COMMISSION?

DO YOU AGREE WITH THE SIZE OF THE MEMBERSHIP OF THE FOOD COMMISSION AND THE PROCESS FOR APPOINTING ITS MEMBERS?

Establishing a Welsh Food Commission could assist with overseeing the success of public bodies in meeting duties set out by the primary and secondary targets; and has the potential to offer an outlet for independent oversight, and the sharing of best practice between different public bodies.

Nevertheless, further to the RSPCA's proposals to add animal welfare as a dedicated secondary goal underpinning this legislation's key objectives, we would also urge that the functions of this Commission include **advising public bodies about animal welfare**. While this would not necessarily need to be written on the face of the Bill - and could be included in the existing function to "*advise, inform and assist public bodies, and other persons, in relation to food matters*" - it will be important the Commission carries this dedicated animal welfare expertise within its proposed membership of a chair and five to seven members. Additionally, animal welfare should be central to the work of the Commission when carrying out its function "*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*".

While the Bill contains proposals for the Welsh Government to consult with the Senedd before appointing Commission members, we would urge a wider consultation process including impacted sectors - such as animal welfare, agriculture etc - when seeking suitable nominees to sit on the Commission.

Furthermore, while the proposal is for a Commission rather than a Commissioner, the RSPCA would also welcome more information as to how a Welsh Food Commission would work with bodies in Wales, such as the Future Generations Commissioner, the Children's Commissioner, and other such bodies, to ensure no duplication of work. For example, under the Well-being of Future Generations Act, public bodies in Wales must already think about the long-term impact of their decisions, and to tackle health inequalities and climate change - so it would be prudent to explore how such bodies would work together; and to avoid unnecessary overlap.

DO YOU AGREE THAT THERE IS A NEED FOR A NATIONAL FOOD STRATEGY?

DO YOU BELIEVE THE WELSH GOVERNMENT'S CURRENT STRATEGIES RELATING TO 'FOOD' ARE SUFFICIENTLY JOINED UP / COHERENT?

Proposals for a National Food Strategy come as the UK Government publishes its own Food Strategy,

⁴ YouGov Plc. Total sample size was 1,001 Welsh adults (aged 18+). Fieldwork was undertaken between 4th - 8th September 2014. The survey was carried out online. The figures have been weighted and are representative of all Welsh adults (aged 18+).

⁵ European Commission, 2005. Eurobarometer – Attitudes of consumers towards the welfare of farmed animals Q12.

which the RSPCA believes provided a once in a generation opportunity to address some of the biggest issues facing England and, on reserved matters, the wider UK.

While we believe the UK Government has missed numerous key opportunities through the recent publication of this Strategy, such opportunities in a devolved context will present themselves to Wales with the publication of the Welsh Government's own Strategy, as proposed by this legislation.

While far from perfect, the new UK Strategy, does reference animal welfare objectives - including improving and expanding mandatory labelling requirements and that animal welfare be embedded in public procurement. Clearly, animal welfare would need to be a key consideration within any National Food Strategy for Wales; and thus if it is not an explicit goal within any future Food (Wales) Bill, there is a risk that a Strategy could be published with a statutory imperative to focus on some issues; but not specifically animal welfare.

As such, while the Bill is concerned primarily with any such Strategy advancing the primary and secondary food goals set out by the draft Food (Wales) Bill; RSPCA Cymru would welcome the publication of a wider National Food Strategy that outlines - in addition to the goals - all policy work linked to food in Wales including utilising opportunities to transform animal welfare standards, regardless of whether these are added to the list of goals contained within this Bill. This process could involve 'joining-up' existing Welsh Government strategies related to food and drink, such as '[A Vision for the Food & Drink industry from 2021](#)', plans for a Community Food Strategy, and the upcoming Sustainable Farming Scheme; ensuring they were accessible to impacted sectors and the wider public in Wales.

DO YOU AGREE THAT THERE IS A NEED FOR LOCAL FOOD PLANS?

Plans to encourage local authorities and local health boards to establish their own local food plans are potentially welcome too - but, in a similar vein to any National Strategy, these must ensure animal welfare is a focus. Indeed, as noted above, if animal welfare is not included as a specific secondary goal, there is a risk all local authorities and local health boards will have a statutory obligation to provide a Local Food Plan that doesn't need to reference the welfare of animals.

Through their procurement functions, and in their contact with citizens of the communities they represent, both councils and health boards are exceptionally well placed to promote animal welfare information, improve the accessibility of higher welfare options, and help citizens make informed, healthy choices about their food.

These discussions come as a new school curriculum is rolled out across Wales - where pupils will be taught through new Areas of Learning and Experience; Learning will include (under the Health and Well-being AoLE) empathy; and (including under the Humanities and Science and Technology AoLEs), becoming "ethical, informed citizens of Wales and the world"⁶. Such teaching offers opportunities to learn about animal welfare and sustainable food in the classroom; and the RSPCA would welcome discussions about how such opportunities could feature in a Local Food Plan published by a local authority under this proposed legislation. To this end, the RSPCA's new [Animal Kindness Index](#) found 88 percent of people in Wales believe animal welfare should be taught in schools; the highest of any UK nation.

⁶ Hwb - [Curriculum for Wales](#), accessed 15 September 2022