

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](#)

FB026

Ymateb gan: | Response from: Awdurdod Parc Cenedlaethol Bannau Brycheiniog | Brecon Beacons National Park Authority

Question	Response
Why is the Bill required	
<b>Question 1:</b> Do you agree with the overarching principles that the Bill seeks to achieve?	<p>Yes, the Brecon Beacons National Park Authority (BBNPA) is broadly in favour of the overarching principles. As an area, the Brecon Beacons National Park is over-reliant on fossil fuels for energy, on private vehicles for most journeys, on old, inefficient housing stock, and on imports to the area of food, energy and other consumable goods. It is only self-sufficient in water supply but that is stressed and diminishing in supply due to consumption, abstraction and climate-related meteorological changes.</p> <p>Through a focus on local, seasonal and sustainable food supply Wales can diversify land use, support regenerative farming and nature recovery, which is essential to restore the biodiversity and ecosystem processes that underpin all life and nature-derived ecosystem services, including food.</p>

	<p>What relation does this Food (Wales) Bill have with the Welsh Government's intention to develop a Community Food Strategy?</p> <hr/>
<p><b>Question 2:</b> Do you think there is a need for this legislation? Can you provide reasons for your answer.</p>	<p>Yes, the BBNPA agrees that legislation is required. Alongside food and animal welfare standards, regulation is required to guarantee local supply chains supporting local, circular economies, local diversification and the related changes deliver in related areas, e.g., nature recovery. Akin to the Climate Change Act 2008, legislation will permit mandatory targets to be set, enabling the Welsh Food Commission to report on progress and make recommendations against these in a manner like that of the UK Climate Change Committee and Adaptation Committee; delivering accountability on behalf of the socially excluded and the environment.</p> <hr/>
<p><b>Food Goals</b></p>	
<p><b>Question 3:</b> Please provide your views on the inclusion of the Food Goals within the Bill as the means to underpin the policy objectives.</p>	<p>The BBNPA supports the inclusion of Primary and Secondary Food Goals because these underline the importance of making this sector environmentally, ecologically, economically and socially resilient and sustainable. They also provide the regulatory framework for the Food Commission Wales to track progress and make recommendations at a Welsh Government and Local Authority level. We agree that the Secondary Food Goals should function similarly to the WFG Act five ways of working.</p>

<p><b>Question 4:</b> Do you agree with the inclusion of a Primary Food Goal supplemented by Secondary Food Goals?</p>	<p>Yes; see answers to Q3.</p>
<p><b>Question 5:</b> Are there additional / different areas you think should be included in the Food Goals?</p>	<p><b>We recommend</b> that the proportion of locally grown and produced food procured by the public and privatised utilities sectors should be included, i.e., all sectors that are included under Section 6 of the Environment (Wales) Act 2016.</p> <p><b>We recommend</b> that sectoral targets are set for reducing and eliminating food waste and related waste, for example in the retail, hospitality, health, education, agriculture and other food producing, distribution and consumption sectors. We believe that mandatory, sectoral targets will drive invention and solutions.</p> <p><b>We recommend</b> that in all these sectors, targets should be set for reducing, eliminating and replacing (with benign alternatives) the use of phosphates, nitrates and other compounds that contribute to nutrient enrichment and pollution in the environment.</p> <p><b>We recommend</b> that targets are set in all these sectors for eliminating the use of single use plastic and non-recyclable packaging in food and drink.</p> <p><b>We recommend</b> that other sectors, for which targets might not be appropriate, are nonetheless relevant to the Bill's intentions. Sectors might include:</p> <ul style="list-style-type: none"> <li>• The agriculture sector, for example non-agricultural farm-based enterprises</li> </ul>

	<ul style="list-style-type: none"> <li>• Ending all food banks in Wales through a combination of socially progressive measures, including health-related and a universal basic income</li> <li>• Developing Community Strategies for <ul style="list-style-type: none"> <li>i) Renewable Energy generation (place-based renewable energy, neighbourhood combined heat and power, retrofitting), and</li> <li>ii) Waste (zero waste export)</li> </ul> </li> <li>• Goods distribution networks rely mostly on Wales' road network; targets must be set for rail, light rail and regional and local goods transfer stations</li> <li>• Local food economies are related to other health benefits, for example Active Travel Networks.</li> </ul> <p><b>We recommend</b> that targets are set, and resources committed, to ensure that schools, colleges, further and higher education, hospitals, hospices and care homes, provide the most nutritious, environmentally sustainable and best prepared food in Wales.</p> <p><b>We recommend</b> that Planning Policy Wales provides scope for local planning authorities, retrospectively and going forwards, to limit and reverse the density of fast-food outlets within a set radius, e.g., 1 mile, of every primary and secondary school.</p> <p><b>We recommend</b> the reintroduction of Domestic Science and Home Economics classes in every primary and secondary school, compulsory up to GCSE.</p>
<p><b>Question 6:</b> Do you have any additional</p>	<p>No</p>

<p>comments on the Food Goals, including the resource implications of the proposals and how these could be minimised?</p>	
<p><b>Question 7:</b> Please provide your views on the inclusion of targets within the Bill as the means to measure how the Food Goals are being advanced.</p>	<p>We agree with the inclusion of targets for measuring progress towards achieving Food Goals. However, we believe that these should be set by the local authorities, e.g., within a Local Development Plan context or Regional Food Strategy. This would enable targets to reflect local / regional feasibility and distinctiveness.</p> <p><b>We recommend</b> that the targets set are SMART and their measurability is set in terms of attributes that can be recorded. For example, a target to increase the network of market garden towns in every town in Wales might have attributes, such as:</p> <ul style="list-style-type: none"> <li>• Number of relevant planning permissions <i>commenced</i></li> <li>• Number of people employed in market gardening and associated food growing and producing sectors</li> <li>• Number of people being educated in market gardening, eco-agriculture, permaculture, hydroponics</li> <li>• Number of farm businesses including horticulture</li> <li>• Number of new horticulture-only businesses</li> </ul>

	<ul style="list-style-type: none"> <li>• Number of public sector procurements from market garden produce</li> <li>• Area of land within and adjacent to the town under market gardening land use; etc.</li> </ul>
<p><b>Question 8:</b> Do you agree with the process for setting the targets?</p>	<p>See answer to Question 7.</p>
<p><b>Question 9:</b> Do you think the reporting mechanisms set out in the draft Bill provide sufficient accountability and scope for scrutiny?</p>	<p><b>We recommend</b> emulating the target tracking and recommendation processes used by the UK Climate Change and Adaptation Committees, and the <a href="#">Risk Assessments</a> they publish. These identify the targets in relevant sectors and track Government progress towards these, providing scope for recommendations and room for improvement by the relevant sectors.</p> <p><b>We recommend</b> that accountability and scrutiny will be improved by ensuring that targets are set for relevant related sectors, for example retail, hospitality, health, education, agriculture and other food producing, distribution and consumption.</p> <ul style="list-style-type: none"> <li>• beyond county boundaries, energy from waste, zero food waste etc.)</li> </ul>
<p><b>Question 10:</b> Do you have any additional comments on the targets, including the</p>	<p>No</p>

<p>resource implications of the proposals and how these could be minimised?</p>	
<p>Wales Food Commission</p>	
<p><b>Question 11:</b> What are your views on the need for a Welsh Food Commission?</p>	<p>Needed, akin to the UK Climate Change and Adaptation Committees driving UK and devolved climate change targets, risk assessments and recommendations.</p>
<p><b>Question 12:</b> Do you agree with the goals and functions of the Welsh Food Commission? If not, what changes would you suggest?</p>	<p>We recommend that the National Food Strategy and Local Food Plans provide the framework for regulation, target setting and recommendations under the Primary and Secondary Food Goals.</p>
<p><b>Question 13:</b> Do you agree with the size of the membership of the Food Commission and the process for appointing its members?</p>	<p>No answer</p>

<p><b>Question 14:</b> 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?</p>	<p>No answer</p>
<p><b>Question 15:</b> Do you have any additional comments on the Food Commission, including the resource implications of the proposals and how these could be minimised?</p>	<p>No answer</p>
<p>National Food Strategy</p>	
<p><b>Question 16:</b> Do you agree that there is a need for a national food strategy?</p>	<p>Yes, provided that i) the National Food Strategy is supported by regulation, SMART target setting, reporting and recommendations, and ii) the National Food Strategy is linked to Regional Food Strategies, working beyond the public sector, and working properly with the agriculture and private sectors.</p>



<p><b>Question 17:</b> Do you believe the Welsh Government’s current strategies relating to ‘food’ are sufficiently joined up / coherent?</p>	<p>See answer to Q16.</p> <p>See the report: <a href="#">Scientists offer blueprint for sustainable redesign of food systems (phys.org)</a>, available here: Steven R. McGreevy et al, Sustainable agrifood systems for a post-growth world, <i>Nature Sustainability</i> (2022). <a href="#">DOI: 10.1038/s41893-022-00933-5</a></p>
<p><b>Question 18:</b> 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?</p>	<p>No answer</p>
<p><b>Question 19:</b> 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?</p>	<p>See our answer to Q12.</p>
<p><b>Question 20:</b> Do you think the provisions of the draft Bill relating to</p>	<p>See our answer to Q12.</p>

<p>reviewing of the national food strategy are sufficient? If not, what changes would you like to see?</p>	
<p><b>Question 21:</b> Do you have any additional comments on the National Food Strategy, including the resource implications of the proposals and how these could be minimised?</p>	<p>What scope is there to work closely with the Future Generations Commissioner, health and education sectors to develop and implement National and Regional Food Strategies?</p>
<p>Local Food Plans</p>	
<p><b>Question 22:</b> Do you agree that there is a need for local food plans?</p>	<p>Provided the Regional / Local Food Plans are supported by regulation, SMART target setting, reporting and recommendations, they are worth introducing.</p>
<p><b>Question 23:</b> 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</p>	<p>We recommend that Planning Policy Wales provides a strong link between Local Food Plans and Local Development Plans. We advise that as <i>Special Purpose Local Authorities</i> and unlike full Unitary Authorities, National Park Authorities are only able to influence the logistics and practical</p>

<p>mechanisms would you put in place?</p>	<p>delivery of a local food plan through the planning and grant making processes.</p> <p><b>We recommend</b>, therefore, that any target setting for National Park Authorities must be commensurate with the limits of their authority.</p>
<p><b>Question 24:</b> 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?</p>	<p>No answer</p>
<p><b>Question 25:</b> 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?</p>	<p>No answer</p>
<p><b>Question 26:</b> Do you have any additional comments on local food plans, including the resource implications of the proposals and how</p>	<p>No answer</p>

these could be minimised?	
<b>General Provisions</b>	
<b>Question 27:</b> Do you agree with the list of persons defined as being a 'public body' for the purpose of this Bill?	<a href="#">See our answer to Q23.</a>
<b>Question 27:</b> Do you have any views on the process for making regulations set out in the Bill?	<a href="#">No</a>
<b>Question 27:</b> Do you have any views on the proposed commencement date for the Act?	<a href="#">As soon as possible.</a>
<b>General Views</b>	
Please provide any additional information relevant to the draft Bill.	