

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](#)

FB028

Ymateb gan: | Response from: Coed Cadw – the Woodland Trust

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Food policy is not an area of major expertise for the Woodland Trust; our comments are limited to the over-arching sustainability context.

Key points

- The purpose should be a “sustainable” food system, not merely a “more sustainable” one.
- All components of a sustainable food system must sit within a wider sustainability framework, including that of sustainable land management.
- We recommend use of language around food sovereignty which emphasises the local food economies, sustainable food availability, environmental sustainability and the people who produce, distribute, and consume food.
- Targets should not be used to drive single purpose actions. There must be baskets of targets balancing all aspects of sustainability.
- We suggest more clarity on the purpose of targets in relation to (mostly) free markets for food, for example using targets only to address clear market failure in the delivery of public benefit outcomes.
- We observe in the farming sector an accelerating reaction against intensification driven by production targets which has threatened both the sustainability and viability of family farms.
- In our own work on the use of trees on farms we try to develop routes to more sustainable farming that deliver food production hand in hand with wider objectives.
- A Food Commission must avoid emulating the former Forestry Commission in an over-focus on production at the expense of sustainability and viability.

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

- 1.1. We support bringing sustainability requirements into the heart of food policy and the aspiration to *“develop an holistic, coherent framework”*
- 1.2. We suggest that the purpose must be to establish a “sustainable” food system, rather than the implication of a less ambitious “more sustainable” one. Sustainability will be a long journey, but it would be perverse for legislation to limit the destination in this way.
- 1.3. Food security is not achievable without genuine sustainability in production, sourcing, processing and distribution. (The same applies to energy security, timber security etc, etc). This in turn implies that the “holistic and coherent framework” of the food system must sit within this wider framework of sustainable land management, one that effectively delivers multiple demands from land use e.g biodiversity, water resources, timber etc etc.
- 1.4. We support the [briefings on food and farming by Wales Environment Link](#) (WEL). For example, WEL highlight the dependency of the food system on environmental sustainability: *The [UK’s first Food Security Report](#) 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 (loss).”*

- 1.5. The requirement to function sustainably must feed through to all components of the food system including the food goals, the Food Commission, National Food Strategy and the system of governance (para 24).
  - 1.6. We would like to see a definition of “food security”, referred to in the purpose of the Bill. We suggest the use of the language of “food sovereignty” might be preferable as this places more emphasis on local food economies, sustainable food availability, environmental sustainability and the people who produce, distribute, and consume food. The WEL briefing on [Sustainable Food Production and Food Security](#) provides more discussion on this point.
- 2. Do you think there is a need for this legislation? Can you provide reasons for your answer.**
- 2.1. It would be valuable to explicitly bring food policy within a sustainability framework.
- 3. Food Goals: Questions 3-6**
- 3.1. We agree that Food Goals should clearly be framed within the requirements for sustainability, demonstrably applying the principles of the “well-being goals” set out in section 4 of the Future Generations Act. We suggest the linkage needs to be explicitly defined, for example, our food system must:
    - equally support a food-secure and healthy nation
    - support our community our culture and economy
    - deliver meaningful action on the climate and nature emergency
    - act in a way that is globally responsible
    - ensure our future generations can thrive

**Targets: Questions 7 -10**

- 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.**
- 7.7. We would be concerned if targets are used to try to drive single purpose actions to the detriment of other policy goals that do not have equivalent targets. An example is arguments for the afforestation of land purely for the purpose of meeting carbon sequestration targets as [highlighted by FUU](#). Another example is the way river quality has been destroyed by the financial focus of the water industry.
  - 7.8. We suggest that government needs a balanced basket of targets, which could include food targets but also need to include biodiversity targets, emission reduction targets amongst many others. We note that the Future Generations Act aspires to do this and suggest that all statutory targets should fit within and help develop the over-arching framework provided by this Act.
  - 7.9. An example of the need to integrate with other targets is the recent [assessment on the lack of progress with emissions reduction in the agriculture and land use sector from the Committee for Climate Change](#):

*Agriculture and land use urgently need a decarbonisation strategy to match those for other sectors. It must cover the multiple objectives for land, including adapting to climate change, food security, biodiversity, and wider environmental goals.*
- 8. Do you agree with the process for setting the targets?**
- 8.7. No, we do not agree that food targets should be set in isolation but must be aligned with the need to drive change towards sustainability. We suggest more clarity on the purpose of targets in relation to (mostly) free markets for food, for example using targets only to

address clear market failure in the delivery of public benefit outcomes such as environmental outcomes, health (e.g obesity), food waste reduction and climate mitigation.

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

9.7. We emphasise the need to set and report on targets within a wider framework such as provided under the Future Generations Act.

9.8. How would target reporting relate to other statutory reporting such as the State of Natural Resources Report (SoNaRR) required under the Environment Act (Wales)? For the forestry sector SoNaRR attempts to report both on the environmental state of woodland and the state of the forest industry. Is a “State of Farming” report envisaged?

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

10.7. A major issue that we see many farmers now trying to address is reducing dependence on high levels of expensive and environmentally unsustainable inputs such as for fertiliser, feed and pesticides. This reflects a reaction against intensification driven by production targets which has threatened both the sustainability and viability of family farms.

“Production at any cost” has led to costs escalating faster than income, financial insecurity, environmental damage and reduced resilience, with significant costs passed on to other stakeholders and the public purse. The NFFN [Rethink Food: The Need for Change](#) report discusses this issue in detail.

10.8. There are many ways forward towards more sustainable farming that delivers food production hand in hand with wider objectives. In our own work with [trees on Farms in Wales](#) we try to do this, as also recognised by [NFU Cymru in their Growing Together strategy](#).

**11. Food Commission: Questions 11 - 15**

11.7. A Welsh Food Commission must be subject to a duty to promote sustainability and be in itself subject to the requirements of the Future Generations Act

11.8. The name “Food Commission” invites comparison with the former Forestry Commission before it was absorbed into NRW because of its over-focus on production at the expense of the sustainability and viability. A Food Commission would need to focus more on the social and environmental impact of food policy and be able to credibly reflect the interest of all stakeholders.

**12. National Food Strategy: Questions 16 - 21**

12.7. We re-iterate our comment in answer to earlier questions that a food strategy cannot exist in isolation and has to be framed within a wider context of sustainability requirements including sustainable land management.

**22 – 26 Local food plans**

No response

**27 – 29 General Provisions**

No response