

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](#)

OSFB008

Ymateb gan: | Response from: Unigolyn | An individual

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## Overarching principles

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

No

The Sustainable food system needs to reduce biodiversity loss, strengthen nutrition security, improve Wales' socio-economic wellbeing and enhance citizen choice of healthy food.

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

Yes

Without legislation, BigAg, Big Food and Big pharmaceutical will have free reign to continue the production and sale of unhealthy food that makes citizens sick with a cocktail of medications being prescribed as the solution.

There is need for joined up, evidence based, cross sectoral policies supporting Welsh mixed agroecological systems, improving soil health and production of high quality, nutrient dense feed for animals and food for humans, and a food system that works for people and planet

## Food Goals

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

Food goals are really important to set the lens through which joined up, evidence-based policy will developed

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

Yes. However, the primary food goal is just focusing on food security in a sustainable food system, and this is then considered through the five areas listed which relate to the Future of Welsh Generations Act

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

We need to shift to nutrition security, not food security and not food poverty

We need to talk about regenerative food systems

We need to look at access to and availability of culturally appropriate food

Food should be local, seasonal and high quality, based on nutrient density

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

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Nutrient dense food has major cost saving potential - it has a greater yield, of more uniform growth, plants are totally resistance to pests and diseases, it tastes better and has a longer shelf-life.

Nutrient dense food is correlated with greater carbon sequestration, better soil structure, higher water holding capacity, no use of toxic chemicals or synthetic fertilisers, no pollution of soils and water courses, and actually contains high levels of antioxidants and polyphenols. So, it's a win-win-win approach!

Question 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.

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Targets are necessary to be able to monitor change; however, is there a WG budget for policing compliance with regulations to meet targets. The Bill needs to have teeth!

Question 8: Do you agree with the process for setting the targets?

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Two years seems a long time for regulations to be made

Will Welsh Ministers be employed to just focus on the Food Bill? Otherwise, Ministers will be juggling creating regulations with other tasks and things will slide

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

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35 doesnt stipulate the frequency of reporting.

Review should be sooner than five years, such as two years would be preferable to identify areas that need to start or speed up

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

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Are the targets process or outcome indicators?

Are target achievement dates going to be written in stone? Or they will slide!

Too many targets will make policy change very onerous to monitor

## Wales Food Commission

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

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This is essential to have a body that values food and focuses on food regulations, policies, strategies and plans, developing food expertise professionals in Wales to advise different stakeholders

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

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Functions need to emphasise agroecological farming systems and high quality, nutrient dense food as 'food matters' is very broad and can include unhealthy food produced through industrial agriculture

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

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A chair and 5-7 members is a small number considering the number of functions to be achieved across Wales

Question 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?

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A term of five years is very long; particularly if they are not supporting agroecology and food quality, effectively holding back the country's development

If the person is not supporting agroecology and food quality, they should not be re-appointed

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

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Does the Food Commission have power to influence wide spread change so that everyone listens to recommendations and makes progressive changes?

Clause 55 opens the door to underfunding if Welsh Ministers not wanting change are calling the shots and don't like what the Food Commission is saying/doing

## National Food Strategy

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

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Definitely, this will give the framework for creating change on food systems in Wales

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

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No, there seems very little understanding about the linkages between soil health, plant health, animal health, food quality, human nutrition and health, and planetary health

Health justice is not sufficiently prioritised nor environmental and social justice, and animal welfare

Linkages between soil microbiome and animal/human gut microbiomes needs prioritising

There also needs to be support for agroecological growers and farmers who are restoring soil health, and including livestock in their regenerative land management practices

Additionally, there needs to be support for agroforestry and not just indiscriminate tree planting

Farmers' mental health needs to be considered too

Question 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?

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No, Welsh Ministers need to be listening to senior scientists and researchers, who know the evidence base related to agroecology, regenerative agriculture, permaculture. Systems need to be in place to stop business as usual (industrial agriculture)

Question 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?

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No, It must be simple to attribute improvements in food goals and achieving food targets to the national food strategy

Question 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?

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Five years is a long time for a review and revising the strategy will then take time

Question 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?

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The national food strategy must have teeth to ensure that business as usual (BigAg, Big Food and Big pharmaceutical ) does not prevail

When will the National Food Strategy be developed?

## Local Food Plans

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

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Yes. It is essential that every council/LA has a sustainable food partnership working with strategic partners and communities using peoples assemblies and forums to develop contextually relevant plans with optimal buy-in

Question 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?

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No. If every council/LA has a Sustainable Food Place [www.sustainablefoodplaces.org](http://www.sustainablefoodplaces.org) with a sustainable food partnership, then the whole planning process will be inclusive and participatory with key stakeholders involved

Question 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?

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No. There needs to be cross-sectoral reporting giving positive and negative aspects; ideally through the Sustainable Food Partnership, which includes different public bodies

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Question 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?

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Again, 5 years seems a long time before a review is undertaken. This should be undertaken by the Sustainable Food Partnership and then any revisions/suggestions are developed by the Sustainable Food Partnership, which includes different public bodies

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

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Research on Sustainable Food Places shows that there are significant social and economic impacts for the place. Therefore, Wales needs Sustainable Food Partnerships in every council/LA

Agroecology needs to be prioritised

The work of the Urban Agriculture Consortium needs to be shared and amplified

## General Provisions

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

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It would be useful to include Natural Resources Wales because of the linkages with soils, agroecology and nature

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

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The Food Commission should be advising on the development of the regulations, which are evidence based by senior scientists and researchers

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

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Can all the systems be put into place within three months? It seems too short a time period to implement well

## General Views

Please provide any additional information relevant to the draft Bill.

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To be transformative, the draft Bill needs to incorporate agroecology with food systems and support farmers and growers to transition as quickly as possible from industrial agriculture. The Landworkers Alliance Cymru is campaigning for agroecological production systems and food sovereignty which is particularly important for Wales because of its rich food culture. Urban Agriculture Consortium is influencing policy towards urban agroecology and urban/peri-urban farming

We need to shift the narrative from food quantity based on yield to food quality based on nutrient density. Research conducted by the Bionutrient Institute (USA) shows huge crop nutrient variation and crops grown using regenerative agricultural practices have the highest antioxidants and polyphenols. Food As Medicine can reverse/prevent diet-related noncommunicable diseases, such as Type 2 Diabetes. Growing Real Food for Nutrition CIC [www.grffn.org](http://www.grffn.org) is conducting laboratory analysis on UK crop and soil samples to determine nutrition profiles, which will help calibrate a Bionutrient meter for real-time measurement of crop nutritional value and increase food chain transparency.

Swansea is on its journey to become a Sustainable Food Place and since March 2021 there has been more interest in food and more food-related events happening. It is essential that Swansea's Bwyd Abertawe initiative and other places wanting to become Sustainable Food Places are supported appropriately by government and key local stakeholders with adequate resources to make transformative change happen on the six key issues. Every council/LA should be a Sustainable Food Place and have a sustainable food partnership to help transform the local food system.