

Food (Wales) Bill

Stage 1 – written evidence

Soil Association Cymru

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At the Soil Association our vision is regeneration – a world with good health, in balance with nature and a safe climate restored for all. We advocate for a mainstream transition to Agroecology. The next three years will be decisive for the future of UK food, farming and forestry. Our experience is in devising and delivering practical and workable food system and farming solutions that have been developed from insights gained from our on-the-ground programmes such as Innovative Farmers, Sustainable Food Places and Food for Life.

We commend the intention of the Bill to “shape a more localised system based on encouraging more local food production and then developing the infrastructure that provides greater opportunities for such produce to be supplied into local communities”. Individual initiatives, such as the Sustainable Food Places¹ network demonstrate the benefits, ambition and potential for community food approaches in Wales. The Soil Association’s Food for Life programme² offers a model for developing an approach to public setting food that both monitors compliance and incentivises implementation of a ‘whole setting approach’. While effective within local areas, there is need for wider system change to create a more robust and sustainable food system across Wales. Coordinated action is needed to integrate food policy across all areas of government including health, education, climate change, agriculture, food production and the economy at a local level. We agree that 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 contradict each other.

¹ Sustainable Food Places in Wales

Sustainable Food Places is a partnership programme led by the Soil Association, Food Matters and Sustain: the alliance for better food and farming. It is funded by the Esmée Fairbairn Foundation and The National Lottery Community Fund. Food Sense Wales is Sustainable Food Place’s national partner in Wales and supports Wales’ seven current Sustainable Food Places members – Food Cardiff, Food Vale, the Monmouthshire Food Partnership, RCT Food, Blaenau Gwent Food Partnership, North Powys Food Partnership and Bwyd Sir Gâr Food in Carmarthenshire. The programme promotes a systems approach that involves and connects key actors at all levels and across all parts of the food system.

² Food for Life

Soil Association’s Food for Life partnership programme brings schools, nurseries, hospitals and care homes, and their surrounding communities together around the core ethos of healthy, tasty and sustainable food. In Scotland, more than half of local authorities are now affiliated with Soil Association Scotland’s Food for Life Scotland (FFLS) programme. Our FFLS team supports councils to achieve the Food for Life Served Here (FFLSH) award for their school meals service, under which points are awarded for spend on Scottish produce. Holders of the FFLSH gold award spend at least 15% of their ingredients budget on organic produce. The programme is a proven model for encouraging the use of more local and sustainable food in public sector kitchens.

Chair Martin Nye **Chief Executive** Helen Browning OBE

We want to see government leadership to overhaul Wales' food system with nature-friendly, agroecological farming supporting healthy and sustainable diets. This is especially important in the face of climate and geopolitical turmoil. We therefore welcome the intention to seek join-up between the Food (Wales) Bill and the forthcoming Agriculture (Wales) Bill.

With all this in mind, we offer the following comments:

Scope of Bill and Primary food goal

- 1. Include a definition of 'food system' to ensure that the scope of the Bill is clear**
- 2. Provide more opportunity for citizens to contribute to the design of their food system** – through a requirement on Welsh Ministers and public bodies (as appropriate) to produce the National Food Strategy, Local Food Plans and targets through co-design. We believe there is merit in including a food goal to improve food sovereignty in Wales, centred on the ability of citizens to design their own food system.

Secondary food goals

- 3. Ensure that the secondary food goals are taken together and delivered in an integrated and balanced way** to avoid selective prioritisation of individual secondary goals
- 4. Incorporate existing environmental legislation and commitments more effectively into the Environment secondary food goal**, including the Environment (Wales) Act 2016. We suggest that the descriptors of this goal could address the Welsh policy context more appropriately as follows:
 - *food production, processing and consumption that restores, maintains and enhances biodiversity and the resilience of ecosystems, and utilises and manages natural resources sustainably*

Rather than

- *Lessening environmental impacts of food production, processing and consumption.*
 - *Enhancing and regenerating the natural environment through food production.*
 - *Restoring and maintaining biodiversity and habitats through food production.*
- 5. Provide clarity on the geographic scope of the Environment secondary food goals**, as the fourth descriptor refers specifically to the global environment, which implies that the previous three may relate only to Wales' environment.

Targets

- 6. Establish a specific requirement within the Environment secondary food goal for both biodiversity and climate change targets** as these are statutory environment priorities, rather than setting one target that covers all aspects of the Environment food goal

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National Food Strategy

We welcome the proposed duty on Welsh Government to publish a National Food Strategy setting out the overall strategy and individual policies that they intend to pursue in order to advance the primary food goal and the secondary food goals and achieve the food targets.

We see the National Food Strategy and secondary food goal targets as key areas for improving Wales' food system. We would like to see these cover minimum public spending targets for local and higher environmental standard produce.

The National Food Strategy and secondary food goal targets provide an opportunity to

- set long-term targets to improve diet-related health for all
- identify how government aims to work with retailers, food businesses, civil society and citizens to shift diets towards less and better meat, while supporting farmers to transition to agroecological farming
- focus on poultry, which makes up almost 50% of the meat in British diets (a proportion that is rising year-on-year). Government should:
- Introduce a commitment to ensuring consumption and production of poultry peaks within the next 12 months, with a rapid decline thereafter.
- Phase out industrially produced chicken meat from all public sector catering.
- Introduce an ultra-processed food (UPF) percentage reduction target in the national diet.
- Shift our reliance on the use of animal feed produced overseas by investing in and supporting Welsh farmers to grow protein crops for feed domestically (to non-intensive livestock systems).

There is an opportunity to learn from other countries, including France, where a percentage reduction target for ultra-processed foods in the national diet was introduced in a Food Law in 2018, and Denmark, where new targets were set in 2021 for doubling the consumption of organic food and doubling organic exports, as well as doubling the amount of land farmed organically, as the Scottish Government has recently pledged to do.

We suggest the Bill will need to

7. **Place a specific duty on Ministers and public bodies to create more localised food chains** through the National Food Strategy and local food plans, and to address public procurement in Wales, with buying standards to be updated and mandated across the public sector.
8. **Introduce a requirement that Welsh Ministers must ensure that expertise from all food goals is represented when consulting independent persons regarding targets and the National Food Strategy** (re 5 (1) (b) Setting targets and 13 (2) (a) National Food Strategy)
9. We want to see the Agriculture (Wales) Bill include **a definition of Sustainable Land Management**, and accordingly the Food Bill should place a requirement on Welsh Ministers and public bodies to ensure that **the National Food Strategy and local food plans should aim to support the uptake of 'Sustainable Land Management'**

Local Food Plans

10. We believe that **there should be clearer linkage between the National Food Strategy and local food plans**. The Bill's requirement for public bodies to merely 'have regard to' the National Food Strategy seems weak in this respect and should be strengthened. We also suggest that the Bill should ensure that public bodies produce local food plans to a common standard.
11. We welcome the requirement on public bodies to report on the effectiveness of their local food plans and the contribution that these make towards food goals and targets. However, we believe that **the Bill requires powers of enforcement** to ensure that reporting is undertaken to the required standard.
12. The Social Partnership and Public Procurement (Wales) Bill requires certain public bodies to carry out contract management duties to ensure that social, economic, environmental and cultural benefits are secured through their supply chains. We note the intention to align this work with the Food Bill's requirement for certain public bodies to produce local food plans, in the case of public bodies specified in the Social Partnership Bill that are the same as those specified in the Food Bill. To ensure complete alignment between the two pieces of legislation we believe it will also be necessary to **ensure that the procurement strategies of all public bodies covered by the Social Partnership Bill are informed by the National Food Strategy and local food plans as established by the Food Bill**. We welcome the intention to ensure that the two Bills remain complimentary.

Food Commission

13. **Introduce a requirement that membership of the Food Commission includes expertise from all food goal areas**
14. **Require the Food Commission to undertake strategic planning, assessing the potential impact of emerging economic, environmental and social risks and opportunities for the delivery of the primary food goal.** Wales does not have direct control over all policy area that influence the food goals. UK trade agreements, common frameworks and the Internal Market Act and UK Government funding for Wales' agricultural support are key determinants of the food goals in Wales.