



25th January 2023

RSPB Cymru's response to the Economy, Trade, and Rural Affairs Committee consultation on the Food (Wales) Bill

RSPB Cymru welcomes the opportunity to comment on the Food (Wales) Bill, which we believe has the potential to help establish the framework for a well-designed sustainable food system to help drive climate action and nature recovery, reconnecting people with the impact of their food. We believe the Bill could play an important role in creating localised supply chains as part of a diverse food system able to withstand future strains, while offering clear opportunities for communities, economies and the environment.

The impact of our food system on our natural environment is of particular importance to RSPB Cymru as the evidence clearly shows that unsustainable farming and food production is the main reason why:

- Wales is now one of the most nature depleted countries in the World¹ with 1 in 6 species threatened with extinction².
- None of our ecosystems (including soils, air and water), essential to our well-being, are resilient³. Most of our soils (except for woodlands) are in poor condition and almost all our water bodies are impacted by agricultural pollution, including all our SAC rivers⁴.
- Agriculture contributes 12% of Welsh greenhouse gas emissions (a figure that is rising), much of it methane from livestock. This figure is higher when imported feeds are factored in⁵.
- Much of Welsh farming, in its current form, is damaging the natural resources essential to maintain food production for this and future generations.

The Food (Wales) Bill has the potential to play an important role in tackling these mounting environmental challenges by embedding sustainability throughout the Welsh food system. However, to achieve this we believe there are key aspects of the Bill (summarised below) that should be strengthened to secure a food system that's good for people, nature and climate.

Summary of key points:

- The Bill should ensure **the secondary goals are given equal weighting** in achieving the primary food goal; also, the Environmental Goal should be fully aligned to existing environmental legislation and commitments.
- The Bill should establish a requirement for **biodiversity and climate change targets** given the significant impact (positive and negative) our food system has on nature and climate.
- An independent **Food Commission** (or equivalent function) would provide valuable independent oversight of a Welsh food system. To be effective the Commission must include appropriate expertise relevant to all secondary goals, including environmental.
- We would welcome the establishment of a **National Food Strategy**, however, to ensure its effectiveness we believe public bodies must have a duty placed on them to implement such a Strategy, rather than have *regard for it*.
- In **amending the secondary food goals**, in addition to the Food Commission, the Bill must also ensure Welsh Ministers seek advice from other persons considered to be independent and with relevant expertise, including environmental.

¹ <https://www.rspb.org.uk/globalassets/downloads/about-us/48398rspb-biodiversity-intactness-index-summary-report-v4.pdf>

² <https://nbn.org.uk/wp-content/uploads/2019/09/State-of-Nature-2019-UK-full-report.pdf>

³ <https://nrw/evidence-and-data/research-and-reports/state-of-natural-resources-report-sonarr-for-wales-2020/?lang=en>

⁴ Tackling Phosphorous Pollution in Wales' Special Area of Conservation Rivers. Welsh Government, 2022.

⁵ <https://gov.wales/sites/default/files/publications/2019-06/agriculture-sector-emission-pathway-factsheet.pdf>

Aspects of the Bill that should be strengthened to embed sustainability across the Welsh food system:

1. Food goals and targets

Goals: We support the overarching primary goal of the *provision of affordable, healthy, and economically, environmentally, and socially sustainable food for the people of Wales*. We understand the primary goal will be achieved via delivery of the secondary goals, which we also welcome as they include the key socio-economic and environmental elements of sustainability. Given that unsuitable food production is the biggest driver of biodiversity loss in Wales⁶ it is particularly encouraging that *restoring and maintaining biodiversity* (along with tackling climate change) is included as an objective of the environmental goal. We do, however, have the following recommendations intended to strengthen the delivery of the goals and their objectives:

- **The Bill should ensure the secondary goals are taken together** and delivered in an integrated and balanced way to avoid focussing delivery on a single or sub-set of secondary goals, which could be the case as currently proposed.
- The Environmental Goal should be **aligned to existing environmental legislation** and commitments more effectively, including the Environment (Wales) Act 2016. Specific objectives should include:
 - *A food system that restores, maintains and enhances biodiversity and secures the resilience of ecosystems, and*
 - *Utilises and manages natural resources sustainably.*

Targets: Our food system is the single largest driver of biodiversity loss in Wales, which is ongoing, and the third largest emitter of greenhouse gas emissions, which are increasing (currently 12% of all emissions). As such we believe the **Bill should establish a specific requirement for biodiversity and climate change targets** as these are statutory environment priorities, as opposed to the existing proposal of a minimum of one unspecified target per secondary goal.

2. Welsh Food Commission

Current Government plans do not include provision for independent oversight of a Welsh food system, which is essential if we are to have an environmental and socially sustainable supply chain from farm to fork. As such **there appears to be the need for an independent Commission** (or equivalent function) as proposed by the Bill to oversee delivery of a joined-up and effective food strategy for Wales.

Given the scale of impact our food system has on nature and climate its essential membership of the Commission includes appropriate environmental expertise if our future food system is to restore and maintain nature and the resilient ecosystems that we all depend on as well as mitigating and adapting to climate change.

3. National Food Strategies and Local Food Plans.

We welcome both initiatives within the Bill as we believe they would establish essential elements of a sustainable food system for Wales. A National Food Strategy that promotes the sustainable production and consumption of more of what we eat in Wales and improves people's access to good quality, nutritious food⁷ would be significant achievement.

This would be very different to our current approach to food production which drives unsustainable growth and produces a very narrow range of commodities, meat and dairy in

⁶ [State of Natural Resources Report \(SoNaRR\)](#)

⁷ In line with advice from The EAT – Lancet Commission on Food, Plant, Health <https://eatforum.org/eat-lancet-commission/>

particular. In some cases, production vastly outweighs consumptions e.g. we only eat 5% of the lamb we produce.

An effective National Food Strategy must embed sustainability at the heart of decision-making and serve to align food policy across portfolios within the context set by the Well-being of Future Generations (Wales) Act 2015. This includes agriculture (including via the Agriculture (Wales) Act and associated Sustainable Farming Scheme), environment (biodiversity and climate change), health and well-being, procurement, and planning e.g., to avoid the proliferation of Intensive Poultry Units we've seen in Powys, which are now impacting water quality.

We also support the proposals for Local Food Plans, **however we believe there should be a duty (rather than have regard for) placed on public bodies to incorporate the National Food Strategy priorities into their decision making** e.g. when sourcing and buying food.

4. Any potential barriers to the implementation of the Bill's provisions and whether the Bill takes account of them;

To what extent new legislation is required depends on how much of the Bill's proposed framework Welsh Government can establish using existing legislation and commitments, including the introduction of Agriculture (Wales) Act and the Community Food Strategy. Therefore, until there is clarity on how Government intends securing a sustainable food system for Wales it is difficult to comment on how much new legislation may be required. However, as current Government plans do not appear to include provision for independent oversight or the means of aligning a food policy across portfolios **there appears to be the need for legislation to establish a National Food Strategy and an independent Commission (or similar) to oversee its delivery.**

5. The appropriateness of the powers in the Bill for Welsh Ministers to make subordinate legislation (as set out in Chapter 6 of Part 1 of the Explanatory Memorandum);

Amending secondary food goals: in addition to the Welsh Food Commission, we believe the Welsh Ministers must also seek advice from other persons considered to be independent and with relevant expertise (including environmental).

6. Whether there are any unintended consequences arising from the Bill;

As currently proposed we are concerned there is a risk that the secondary goals may not be delivered in an integrated and balanced way (see point 1 above). Therefore, we recommend the Bill includes a duty to ensure equal weighting is given to the achievement of secondary goals and associated objectives.

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