

Senedd Cymru

Pwyllgor yr Economi, Masnach a Materion Gwledig
Bil Bwyd (Cymru)
FWB-13
Ymateb gan: Sustain

Welsh Parliament

Economy, Trade, and Rural Affairs Committee
Food (Wales) Bill
Evidence from: Sustain

Food Wales Bill consultation

27 January 2023

This is the response of Sustain: the alliance for better food and farming. This submission does not represent the detailed views of all of Sustain's member organisations, some of whom we understand have put in their own submissions.

Sustain is an alliance of over 100 national organisations working with many more local communities, groups, enterprises and experts across the UK for a better system of food, farming and fishing, and cultivating the movement for change. Together, we advocate food and agriculture policies and practices that enhance the health and welfare of people and animals, improve the working and living environment, enrich society and culture, and promote equity. Many of our alliance members operate partly or fully-focused in Wales, and the following Sustain networks and projects include Welsh-focused activity:

- Sustainable Food Places: a partnership programme led by the Soil Association, Food Matters and Sustain. 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. <https://www.sustainablefoodplaces.org/>
- Food Power: this network has supported local approaches to tackling food poverty, supporting six local alliances in Wales. Note: the national network is dormant, but activity continues in many of the local alliances. <https://www.sustainweb.org/foodpower/>
- Real Bread Campaign: this network of over 2000 bakers and bread lovers, includes many Welsh baking enterprises. <https://www.sustainweb.org/realbread/>

We commend the aims of the Bill, and see that putting the aims set out in legislation would show genuine leadership across the UK, particularly where it is lacking in

Westminster. This builds on a track record of laudable good practice and investment, from Welsh Government, locally and nationally and stakeholders across Wales from pioneering work on tackling holiday hunger to developing new local food hubs. Whilst this work shows intent, the need to scale it and ensure all parts of the food system receive adequate attention in a joined up fashion (as detailed in point 4 below) underline the need for this timely Bill. To this end we are making the following recommendations:

The need for legislation

1. We support the need to put these aims into the overarching legislation suggested, alongside a framework and set of targets, as we believe that this is the only approach to ensure their delivery. Whilst other legislation and structures exist within and overseen by the Welsh Senedd, such as the Wellbeing of Future Generations Act, none include indicators on food, nor have they delivered on the ambitions this Bill sets out.
2. If the alternative is not passing such legislation consideration should be given to recent experiences in Westminster, where years of work and widespread consultation and backing for Henry Dimbleby's National Food Strategy was given lip service by the UK Government in its response, and crucially much of which has since been de-prioritised fundamentally due to the lack of legislation to enforce it, and the lack of a body, such as a Food Commission, or a Commissioner with both the responsibility and influence to ensure its implementation and impact. Welsh Government can not only lead where Westminster has dithered, but in the absence of such policy, it can put in place something that is better suited to local Welsh needs and context.
3. Putting these ambitions into law will help to elevate food policy within Welsh Government, to give it the status and power to better ensure a joined up and balanced approach, where the considerations of economic, health and environmental priorities are not siloed which traditionally has led to contradictory and ultimately damaging practices as detailed in the next section.
4. The proposed legislation could not be more timely. The impact of a failing food system, on rising rates of dietary health which are crippling the NHS and burdening tax-payers, increased household food insecurity, exacerbated by a cost of living crisis. This crisis is also tipping many producers and food enterprises out of business who have little power in unfair supply chain relationships, which leads to losses of livelihoods and a reduced capacity for Wales to feed itself. And this at a time that many producers are struggling to adapt to the impact of climate change, and efforts to mitigate it. Wales is however for now still blessed with healthy networks of local production and supply, and has if it acts now the infrastructure to build back a food system from a foundation of healthy real food, produced locally and in harmony with nature, that if supported to scale up and out would be more affordable and accessible to Welsh citizens and would help

turn the tide against the proliferation of unhealthy options and moreover unhealthy food environments.

5. The Bill and proposals stemming from it, would help to catalyse Welsh food and farming to be investment ready, and make the most of imminent opportunities. One such opportunity is to be in the best position to take advantage of UK Government funding opportunities allocated to local areas. Predecessors to the UK's Shared Prosperity Fund food and farming projects, particularly infrastructure and networks, where there was demonstrable joined up and cross sector approach, building on a well established need, plan for delivery and potential for impact. The Food Bill can help to catalyse local food plans and put local areas in better contention to draw down future funding streams. The planned changes to English public food procurement policy include an ambitious target for local and sustainable produce. With little support to enable the supply of this, there is huge potential for sustainable Welsh producers and those bordering England to expand to supply this market, if given the support and certainty that the Wales Food Bill provides.

Food Goals

6. We support the recommendation from Soil Association Cymru that the secondary food goals are taken together and delivered in an integrated and balanced way to avoid selective prioritisation of individual secondary goals, as flagged in point 3 above.
7. We suggest that under health and social goals, the aim to reduce obesity is extended to reduce obesity and diet-related disease, which would cover a greater breadth of contributors to people's ill health, such as type 2 Diabetes and dental caries.
8. We suggest that under education, the description for food skills be amended as follows so it can speak to a wider application and range of benefits: "Developing food skills to improve personal wellbeing, and professional development to meet current and future food sector needs and opportunities"
9. Whilst the list of secondary food goals is comprehensive in considering the impact of the food system, we would query whether a separate one for food waste is needed, where the impact is environmental, and the descriptor could be added to the Environment criteria above.

Food Commission

10. We recommend the following addition to the functions of the Commission:
h) to understand the relationship with UK national and international policy, and act accordingly, and if necessary seek derogations where proportionate to allow for the implementation of the Food Bill's aims.

Whilst it is implicit in the other functions, this ever-changing and complex inter-relationship of policies needs to be monitored, particularly where they contradict the Bill's aims or prevent its implementation. There may be instances where a derogation, for example from UK policy, is worth exploring and commensurate to the scale of issue concerned.

Local Food Plans

11. Under point 18, regarding the making of local food plans, we strongly recommend that consultation includes as a minimum, representation of local public sector, community groups and food enterprises. With over 20 years experience of working with local areas on creating food strategies and plans across the UK, consistently the only ones that are effectively enacted are those that are produced in consultation with, and driven forward by, a cross-sector partnership. Having such a partnership allows for greater impact, greater institutional memory and learning, less risk of mission drift and reduced capacity than if it is owned by one single organisation or department. Depending on the model of partnership it can also attract extra funding and capacity towards the implementation of its aims.
12. To this end we would recommend that (point 19) Effect of local food plans is renamed Implementation of local food plans, and that the text therein is reworded to recommend that the public body with the duty to implement the local food plan does so by supporting a cross-sector partnership, which we would recommend is elected predominantly from and by local stakeholders in line with the good practice guidelines provided by the Sustainable Food Places network.¹

Contact: Ben Reynolds, Deputy Chief Executive, Sustain. Ben@sustainweb.org

Sustain is a powerful alliance of organisations and communities working together for a better system of food, farming and fishing, and cultivating the movement for change. www.sustainweb.org

¹ https://www.sustainablefoodplaces.org/resources/food_governance_and_strategy/