

Economy, Trade, and Rural Affairs Committee - Draft Food (Wales) Bill

Food Policy Alliance Cymru (FPAC) consultation response

27th January 2023

This response reflects discussion points raised at committee oral evidence sessions on 19th and 25th January 2023

A. An overarching umbrella (systems) approach to food-related policies

Primary legislation that puts the food system in the driving seat (rather than the back seat of other policy areas) provides an opportunity to build a consensus on a collective vision for our food system in Wales. It would enable planning and strategic development to build a more resilient and long-term statutory framework for food policy in Wales. A framework which would operate in and beyond political cycles and become solid, principled, long-term and institutionally embedded, for building food system resilience.

This Bill is important because to date policy incoherence has often led to mixed messages, missed opportunities and contradictory approaches.

We do not feel that syphoning off aspects of this proposed Bill into other parts of legislation (e.g. Agriculture (Wales) Bill or Social Partnerships and Procurement Bill) would be a satisfactory approach as it would still lead to, or even exacerbate policy incoherence. For example, whilst the Social Partnerships and Procurement Bill may link into aspects of procurement within local food plans, it wouldn't take into account aspects such as those detailed in the Health and Social secondary food goal, for example actions to alleviate household food insecurity.

An example of a failure of coherence in Welsh Food policy can be seen in the proliferation of Intensive Poultry Units (IPUs) and their devastating impact on Welsh rivers. Farmers have been encouraged to diversify into poultry units to increase economic security and food production, but there was clearly a failure to consider the environmental impacts of this. In particular the cumulative effect of multiple IPUs in the same catchment area have been ignored and local authorities lack the planning controls needed to control them. Welsh Government is now rightly proposing to incentivise sustainable farming practices, through the Sustainable Farming Scheme; however, the scheme and Agriculture (Wales) Bill include no mention of planning policy and nothing that would prevent this environmentally devastating farming continuing, even by farmers receiving SFS payments.

B. Integrated approach to Food goals

The secondary food goals outlined in the consultation are sectoral and work against the need to take an integrated approach to the food system. It is also worth noting that the Food Waste goal could sit within the Environment Goal since globally food waste contributes between 8 and 10 per cent of total greenhouse gas emissions. FPAC have suggested alternative Food Goals as detailed in our summer consultation response¹, targets for which would be set by the Commission. Here we propose that they could be integrated with the draft Bill as follows:

¹ https://www.foodsensewales.org.uk/app/uploads/2022/10/Draft-Food-Wales-Bill-consultation-response_Eng.pdf

Goal (Draft Food Bill)	Description (FPAC suggestion)
Economic well-being	<ul style="list-style-type: none"> • Sustainable food sector jobs and livelihoods: Those who earn their living within the food system receive, or are enabled to receive, at least the living wage or a fair return for their work and work is free from exploitative practices, and is varied, engaging and empowering (100% of job paying real living wage by 2030) • Sustainable food procurement: Increased public procurement of food from organic or agroecological Welsh producers (30% by 2030)
Health & Social	<ul style="list-style-type: none"> • Food for all: Wales becomes the first nation to eliminate the need for food banks (by 2030). Everyone in Wales has access to the food they need in a dignified way, in order to live a healthy life. • Food for public health: Increased consumption of vegetables, which are produced sustainably in Wales for Wales (75% of Eatwell veg portions by 2030).
Education	<ul style="list-style-type: none"> • Educational provision on food related issues in each key stage in all schools.
Environment	<ul style="list-style-type: none"> • Farming for nature and climate: Increased amount of agroecological production (100% by 2035). • Net Zero food system: A net zero food system for Wales (by 2035). • Global environmental footprint: a 75% reduction in the environmental footprint of food production and consumption at home and overseas by 2035.
Waste	(addressed within Environment and Economic well-being goals)

We would support an overarching requirement that goals be considered together and where a measure to advance one goal is developed; it's impacts on the other goals be considered.

C. Length of time of the legislative process

The legislation is critical for creating long-term sustainability of the Welsh Food System that supersedes political cycles. The legislative process does not prevent the advancement of food-related policies in the meantime and indeed, the process of debating, consulting on and further developing the Food (Wales) Bill will serve to lay the ground for the forthcoming legislation (while recognising the continuing absence of a Commission during this period and the critical role it would play in providing the oversight to ensure better integration across departments of food-related policies). An example would be the Programme for Government commitment to develop a Community Food Strategy. This strategy could form the basis of developing the infrastructure

needed to support public bodies to develop and deliver on local food plans, work that is already progressing through Welsh Government's £2.5m investment in cross-sector food partnerships².

D. Format and role of the Commission and a Commissioner

The Bill has fallen short of suggesting a dedicated Food Commissioner for Wales. We feel that a Food Commissioner, together with the Food Commission, should hold responsibility for carrying out the process of co-production (collaboration and involvement) to develop the Wales National Food Strategy, from the ground up. The Commission would present a draft Strategy, based on co-production principles, to Welsh Ministers for approval. The Commission leading on this process will help ensure that the strategy is integrated across WG departmental priorities.

The requirement for integration and collaboration means that public bodies and Ministers need to work together to seek synergies and align policy across departments in support of its vision of well-being for current and future generations— this is what the Food Bill should seek to do for food-related policies, based on the co-produced Wales National Food Strategy. The Food Commission's role should be to navigate the process of integration of food-related policies across Ministers' portfolio. A Food Commissioner, rather than a Chair of the Food Commission, would carry the responsibility for navigating this process and provide a figurehead that is recognised by the wider Food System community.

E. UK and international Context

Under the current circumstances it would seem both pragmatic and strategic for the Welsh Parliament to build a more resilient and long-term statutory framework for its food policy. Many of the central policy fields that impinge upon our food system (i.e. trade policy, regional economic policy, environmental policy, food and farming policy) are now becoming more (rather than less) vulnerable to partisan party politics and the relatively short political cycles. The political consensus around support schemes has diminished, and, indeed with the UK wide de-regulation of remaining EU regulations due to its 'sunset' clause by the end of 2023, (i.e. the Retained EU Law (Revocation and Reform Bill, currently being processed in UK Parliament), we are likely to witness further deregulations. In addition, recent experiences from Westminster demonstrate that without legislation to enforce, and the lack of a mechanism such as a Food Commission(er) to influence, even well researched, thoroughly consulted upon and supported Food Strategies (Henry Dimbleby's National Food Strategy) can be largely ignored or de-prioritised by Government.

F. How can the Food Bill facilitate access to new Markets?

The Bill can facilitate new markets by bringing together different government departments and public bodies and working with relevant private and community sector organisations to develop new routes to market.

An example of how working across the food system in an integrated way could create new local and sustainable supply chains whilst promoting food education in schools is the Courgette Pilot³. This

² <https://www.foodsensewales.org.uk/minister-for-social-justice-announces-support-for-food-partnerships-across-wales/>

³ <https://www.foodsensewales.org.uk/welsh-veg-for-primary-schools-in-wales-how-a-new-sustainable-supply-chain-investment-scheme-could-drive-up-agroecological-veg-production/>

pilot saw courgettes from Blas Gwent, a south Wales-based agroecological grower being delivered to schools in Cardiff via Wales-based wholesaler, Castell Howell with the support of the Sustainable Food Partnership, Food Cardiff, Cardiff City Council and the participating schools.

If Welsh Government committed to every primary school meal containing 2 portions of veg next school year then they would have to supply 5331 tonnes of veg into schools. If this was all from agroecologically produced Welsh veg then this would generate a guaranteed market for agroecological producers in Wales of around £15m. This would involve doubling the area growing field veg in Wales and would support nearly 100 businesses employing nearly 1000 people. It would also have the knock-on effect of developing a regionalised and resilient network of food producers able to supply veg into the heart of their communities.

G. Definitions

FPAC have some concerns around the definition of 'local food' in the Bill – local food is not always the most environmentally sustainable (or healthy) food. The Welsh Food Commission should have the ability to define 'local food' with this in mind. Any definition of local food should consider the methods of production such as organic standards, Food for Life Served Here awards, Pasture for Life and Fairtrade.

[Food Policy Alliance Cymru](#) is a coalition of organisations and stakeholders building and promoting a collective vision for the Welsh food system.

Through collaboration, engagement and research the Alliance aims to:

- Co-produce a vision for a food system in Wales that connects production, supply and consumption and gives equal consideration to the health and wellbeing of people and nature.
- Advocate for policy change to address climate and ecological emergencies, the public health crisis and the rise in food insecurity.
- Ensure Wales is linked to UK policy, research opportunities and the broader global system

The following members of Food Policy Alliance Cymru have contributed to this response:

Food Sense Wales; Social Farms & Gardens; Gweithwyr y Tir - Landworkers' Alliance Cymru; Urban Agriculture Consortium; Nature Friendly Farming Network Cymru; WWF Cymru; RSPB Cymru; Soil Association Cymru; Dr Angelina Sanderson Bellamy, Association Professor of Food Systems, UWE Bristol; Prof Terry Marsden, Cardiff University; Simon Wright, Director of Food and Rural Economy, University of Wales Trinity Saint David

This consultation may be published and will also be published on

<https://www.foodsensewales.org.uk/good-food-advocacy/food-policy-alliance-cymru/>

Any queries may be directed to foodsensewales@wales.nhs.uk