



NFFN Cymru Response to the ETRA Committee **Stage 1 Scrutiny of the General Principles of the Food (Wales) Bill**

The [Nature Friendly Farming Network](#) (NFFN) is a farmer led organisation established in January 2018. We are uniting farmers across the UK who are committed to growing and providing healthy, nutritious food whilst managing their land for wildlife and the environment.

We have 10 farmers on our NFFN Cymru steering group, as well as 376 farmer members and 678 public members in Wales who support our manifesto, clearly emphasising the support for a sustainable and nature friendly food system.

Key Points

- NFFN Cymru welcomes the introduction of a Wales Food Bill. The Food Bill's primary aim should be to provide a legislative framework that enables policy coherence across the food system guided by agroecological principles.
- At its core, the Bill must ensure effective integration of production, supply and consumption policies across Government (local and national) to address the climate and ecological emergencies, the public health crisis, the rise in household food insecurity and issues surrounding farmers and those working in the food sector struggling to make a living.
- Syphoning off aspects of this proposed Bill into other parts of legislation or work programmes would not be a satisfactory approach as it would still lead to, or even exacerbate policy incoherence. This Bill puts the food system in the driving seat and gives it the priority that it deserves.
- Achieving genuine, long-lasting food security depends on meeting the [six-dimensional food security framework](#) and as such should form the basis of the Primary Food Goals.
- NFFN Cymru, as members of Food Policy Alliance Cymru would recommend incorporating the 6 priorities, as outlined in the [Priorities for a Food System Fit for Future Generations](#), into the secondary food goals.
- Food production in Wales increasingly [relies on resources from overseas](#). To create a globally responsible Wales we must ensure that we understand and seek to minimise our environmental footprint overseas as well as in Wales. We must avoid looking at Wales' food system in isolation.
- 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.
- We disagree with concerns regarding resource requirements, increased bureaucracy and policy misalignment being cited as reasons for not progressing this Bill.

1. *The need for legislation*

1.1 Food is a basic necessity and an essential ingredient for a good life, however the way we currently produce, distribute and consume food contributes towards numerous societal issues.

- We face alarming increases in diet-related disease and health inequalities - almost 60% of adults in Wales are living with overweight or obesity.¹
- 9% of people in Wales experience low food security whilst a fifth of people in Wales worry about running out of food.²
- 1 in 6 wildlife species in Wales is at risk of disappearing altogether, with numerous national and UK reports identifying unsustainable farming and land use as a key driver of environmental degradation.
- Farmers and those working in the food sector are struggling to make a living.³
 - The total number of active farm holdings in Wales has reduced by 830 since 2013.
 - Average Farm Business Income dropped 17% between 2003 and 2017.
 - Across farm types, 59% of farms made a loss in the three years prior to the Covid-19 pandemic.
- In Wales around 400,000 tonnes of food is wasted each year. If only 1% of that is edible, it is enough to contribute to over 9 million meals.⁴

1.2 This clearly demonstrates that the status quo is not an option. We have reached a fork in the road where we must question what we currently produce, how we produce it and if more of the same is the answer. As stated in the NFFN's recent report [Rethink Food: The Need For Change](#), we must re-examine what a good food system looks like to encompass the multiple dimensions of a truly equitable food economy instead of focusing on the volume of output and economic growth as our only indicators of success. We must boldly reimagine how healthy food farmed in nature-friendly systems can reach more tables, how extractive supply chains are shortened and localised, and how active food citizenship and community-led initiatives engage more of society with where and how our food is produced.

1.3 These challenges cannot be addressed via individual Government departments working in silos - we need overarching vision and coordination. Different parts of the food system are interconnected: activities in one part of the system have consequences for other parts, with impacts rippling across the system. A food system policy can explicitly recognise these relationships and build a vision for integrating different parts of the food system in Wales. The Food Bill's primary aim should be to provide a legislative framework that enables policy coherence across the food system guided by agroecological principles.⁵

This framework Bill will facilitate effective food policy governance and set out a clear vision of what the food system should deliver, along with a strategy to execute it. At its core, the Bill must ensure effective integration of production, supply and consumption policies across Government (local and national) to address the climate and ecological emergencies, the public health crisis, the rise in household food insecurity and ensure sustainable food sector jobs and livelihoods.

Syphoning off aspects of this proposed Bill into other parts of legislation or work programmes would not be a satisfactory approach as it would still lead to, or even exacerbate policy incoherence. This Bill puts the food system in the driving seat and gives it the priority that it deserves.

¹ [The primary care needs of people living with overweight and obesity in Wales: Summary](#)

² [Food Security in Wales](#)

³ [Agriculture in Wales 2019](#)

⁴ [Fareshare Cymru](#)

⁵ [UN The 10 Elements of Agroecology](#)

2. Primary Food Goals

2.1 We believe that the primary food goal should be *Food Security*, underpinned by the following interconnected dimensions⁶.

- **Availability:** When there is an adequate supply of food, determined by the level of food production, stock levels and net trade
- **Access:** When all people have economic and physical access to food
- **Utilisation:** When food provides a sufficient level of energy and nutrition to meet physiological needs
- **Stability:** The ability to access sufficient food at all times. Access to food should not be compromised by sudden shocks (e.g. an economic or climatic crisis) or cyclical events (e.g. seasonal food insecurity)
- **Sustainability:** Food system practices that contribute to long-term regeneration of natural, social and economic systems, ensuring the food needs of the present generations are met without compromising the needs of future generations
- **Agency:** Individuals or groups having the capacity to act independently to make choices about what they eat, the foods they produce, how that food is produced, processed and distributed, and to engage in policy processes that shape food systems

2.2 Despite the need to simultaneously deliver each of the dimensions of food security, *availability* often takes precedence. This narrow focus has shaped the global food system and is one of the driving forces behind current food production, farming and land management in the Wales and the UK. Failing to account for the other dimensions means that we'll never achieve food security.

3. Secondary Food Goals

3.1 We welcome the strengthening of the secondary food goals, particularly the environmental food goals. After all, food security is underpinned by a strong and stable environment. Humans cannot survive, much less thrive, without the products and services nature provides. Already many farmers across the UK are capitalising on nature's business benefits⁷. Research shows that integrating a diverse range of habitats and features on farmland can maintain and even increase yields^{8, 9, 10}. Basically, if food is not produced sustainably, stability and utilisation are threatened, which risks long-term availability and access.¹¹ Welsh farming has the potential to produce diverse, nutrient-dense foods while restoring nature, locking carbon into healthy soils and reducing vulnerability in a global marketplace.

3.2 We welcome the Bill's intention to *minimises Wales' global environmental footprint*. This recognises that food production in Wales is part of a much larger, and increasingly globalised, food system. Food production in Wales increasingly relies on resources from overseas. We also produce food for export and import large quantities. To create a globally responsible Wales we must ensure that we understand and seek to minimise our environmental footprint overseas as well as in Wales. For example, Wales' imports 190,000 tonnes of soy a year, of which around 80% is mostly imported into Wales in the form of meal and beans for livestock feed. The Welsh poultry industry is estimated to be responsible for consuming 48% of Wales' imported soy feed for livestock, followed by dairy (20%) and sheep (19%). However, nearly three-quarters of the soy import land footprint falls in countries that are high or very high risk for deforestation and/or social issues, including Paraguay, Brazil, and Argentina.¹² Reliance on this source is problematic from an economic, food security and environmental impact perspective. As such, the Bill must therefore avoid looking at Wales' food system in isolation.

⁶ [The case for a six-dimensional food security framework](#)

⁷ [Nature Means Business Establishing the Balance Between Food Production and Improving Nature](#)

⁸ [Long-term evidence for ecological intensification as a pathway to sustainable agriculture](#)

⁹ [Wildlife-friendly farming increases crop yield: evidence for ecological intensification](#)

¹⁰ [Less is more: Improving profitability and the natural environment in hill and other marginal farming systems](#)

¹¹ [Food Security and Nutrition Building a Global Narrative Towards 2030](#)

¹² [Wales And Global Responsibility Addressing Wales' Overseas Land Footprint](#)

3.3 NFFN Cymru, as members of Food Policy Alliance Cymru would recommend incorporating the 6 priorities, as outlined in the [Priorities for a Food System Fit for Future Generations](#), into the secondary food goals.

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)

Setting multiple, cross-cutting targets can help avoid a siloed approach that drive single purpose actions. 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.

4. Food Commission

- 4.1 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.
- 4.2 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.

5. Addressing Concerns

5.1 We are aware of concerns regarding resource requirements, bureaucracy and policy misalignment being cited as reasons for not progressing with this Bill.

5.2 *The Bill is resource-consuming and bureaucratic...*

We would ask whether we can afford not to progress with this Bill? Effective policy governance and co-ordination can help reduce astronomical costs associated with the current food system;

- Full social cost of obesity to Wales is around £3 billion a year¹³.
- Every £1 we spend on food at the till generates a hidden costs of £1 which is spent mainly to address environmental and public health issues.¹⁴
- If every UK household stopped wasting food for one day, it would do the same for greenhouse gas emissions as planting 230 million trees yearly.¹⁵

We would also reap the rewards of income generated through facilitating a localised food economy centred on regenerative and agroecological farming practices.

- Local food systems¹⁶ allow for a larger proportion of revenues to be retained in the local economy. Explanatory Memorandum states that local food program investments have shown returns of over £4 for every £1 invested.
- There are numerous case studies and examples of how regenerative farming and agroecological farming can help improve farm profitability.¹⁷ In Wales, the management and use of the environment, and the multiplied economic effects of this, generates spending of around £9 billion each year to Wales. £1 in every £11 of Welsh GDP is dependent on the environment.¹⁸

The costs of not progressing with this Bill may be far greater than the costs of delivering on it. However this requires long term thinking. This is difficult for Government administrations who often prioritise short term benefits, particularly when it come so the economy.

5.3 *Integration with other legislation...*

This Bill, as we perceive it, would be a framework Bill that establishes the principles of what our food system should work towards. 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 It would sit above other pieces of legislation and work programmes related to food (e.g. the Agriculture Bill, Sustainable Farming Scheme and Community Food Strategy) to give purpose, guidance and clarity. Far from being a hindrance, we believe the Bill would complement and improve Welsh Government's exiting legislative programme.

5.4 *Risk of duplication or misalignment with existing targets...*

A framework Bill like this can help co-ordinate and inform target setting. Targets and goals can be discussed together, informed by the Commission, Senedd and stakeholders so that a holistic view is taken. In doing so, any misalignment can be identified and addressed. As such, we believe that the Bill is needed to address this very issue.

¹³ [The annual social cost of obesity in the UK](#)

¹⁴ [True Costs Accounting – Sustainable Food Trust](#)

¹⁵ [Wasting Food Feeds Climate Change](#)

¹⁶ *We note that 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 agroecology, organic standards, Food for Life Served Here awards, Pasture for Life and Fairtrade.*

¹⁷ [Nature Means Business Establishing the Balance Between Food Production and Improving Nature](#)

¹⁸ [Valuing Our Environment: The Economic Impact of the Environment of Wales](#)