



Senedd Cymru  
Pwyllgor yr Economi, Masnach a Materion Gwledig  
Bil Bwyd (Cymru)  
FWB-27  
Ymateb gan: Gweithwyr y Tir Cymru

Welsh Parliament  
Economy, Trade, and Rural Affairs Committee  
Food (Wales) Bill

Evidence from: Landworkers' Alliance Cymru

27/01/2023

## **Gweithwyr y Tir - Landworkers' Alliance Cymru response to Economy Trade & Rural Affairs Committee Consultation on Food (Wales) Bill**

### **1 Introduction**

The Landworkers' Alliance (LWA) is a grassroots union of farmers, growers and land-based workers with a mission to improve the livelihoods of our members and create a better food system for everyone. Gweithwyr y Tir - LWA Cymru has a growing membership of over 200 members across Wales, part of the more than 2,500 members UK wide. We are a democratic member-led union, run by producers for producers, and are members of La Via Campesina, the global organisation of over 200 million small-scale producers and peasant farmers. We campaign for a food system based on food sovereignty<sup>1</sup> and agroecology<sup>2</sup>.

Our members typically use local supply chains and direct to customer methods to sell ecologically sustainable produce. They are already participating in achieving the proposed Food Goals, but often with little or no Government support, and in some cases they are actively obstructed by some legislation, despite seeking to achieve the goals of other legislation.

We support the overall aims and framework of the Food (Wales) Bill and we believe that, with some amendments, it can help bring about more policy coherence and support those seeking to make positive contributions to the Food System. We also welcome the updates made since the Draft Bill was consulted on by Peter Fox MS in September; particularly the amendments made to the Environment and Health & Social, Food Goals, which are now more comprehensive. However, we believe that there are still areas that could be improved, and policy areas missing: both national and local planning policy needs to be covered by the Food Bill. This is the area where we see the most direct contradictions in policy aims and practice.

---

<sup>1</sup> "the right of peoples to healthy and culturally appropriate food produced through ecologically sound and sustainable methods, and their right to define their own food and agriculture systems" Declaration of the Forum for Food Sovereignty, Nyéléni 2007, p.1, <https://nyeleni.org/spip.php?article290> (accessed 22 October 2019).

<sup>2</sup> Agroecology is a holistic and integrated approach that simultaneously applies ecological and social concepts and principles to the design and management of sustainable agriculture and food systems. See here for more info: <https://www.fao.org/agroecology/overview/en/>

## 2 The need for legislation

We strongly believe that legislation is needed to ensure policy making that concerns food takes a systemic approach, considering all aspects of the supply chain including production, distribution, processing, retail and consumption as well as the different impacts.

### 2.1 Policy incoherence & contradictions

Unfortunately, to date policy making in food and agriculture has been incoherent and siloed with policies working against each other.

An example of a failure of coherence in Welsh Food policy can be seen in the contradiction between paying farmers to farm more sustainably, whilst encouraging a proliferation of Intensive Poultry Units (IPUs), which have had devastating impact on Welsh rivers. Farmers have been encouraged to diversify into poultry units to increase economic security and food production, even receiving grants for this diversification in many cases. However, there was clearly a failure to consider the environmental impacts that incentivising these IPUs would have, particularly the cumulative effect of multiple IPUs in the same catchment area. Over recent years the Welsh rivers have deteriorate but the government response has been inadequate and new units continue to be built. Local authorities continue to consent to these IPUs, despite local environmental impacts and opposition from local people.

Welsh Government is now rightly proposing to incentivise sustainable farming practices, through the Sustainable Farming Scheme (SFS); however, the scheme and Agriculture (Wales) Bill include nothing that would prevent this environmentally devastating farming continuing, even by farmers receiving SFS payments.

Were national and local policy makers required to consider environmental and economic impacts together, it is difficult to see how we could end up with such contradictions.

Other examples of policy incoherence include: the lack of attention to food in Welsh Government's Net-Zero plans, despite the fact that the food system overall contributes to roughly 30% of greenhouse gas emissions; the difference between the strategic direction of growth and industrialisation of the food manufacturing sector versus a clear policy direction of 'sustainable agriculture'; Minimum alcohol pricing as part of the Public Health (Wales) Act vs Welsh Government's Food & Drink Strategy, which includes promotion of Welsh alcohol businesses; and missed opportunities to connect Welsh Government's Food and Drink Retail Plan with opportunities within the Healthy Weight Healthy Wales (obesity strategy) including ambitions for a Healthy Food Environment.

The Food (Wales) Bill rightly tries to address this policy incoherence. We are aware that Welsh Government, and the Minister for Rural Affairs in particular does not support the Bill<sup>3</sup> because they do not believe that legislation is necessary. However, to date they have not answered how the contradictions such as those referenced above will be addressed within the existing legislative frameworks.

---

<sup>3</sup> <http://www.senedd.tv/Meeting/Archive/17dd9365-fd38-4377-8f9b-b7ee0ed3793d?autostart=True>

## 2.2 Increasing the resilience of our food system

Whilst the proposed Agriculture (Wales) Bill and Sustainable Farming Scheme seek to make Welsh farming more sustainable, they do not address the resilience of our food system or the question of what is produced and how to ensure the people of Wales can access sustainably produced Welsh food.

Our current model of importing the majority of fruit, vegetables and grains eaten in Wales and exporting the majority of the meat produced in Wales is vulnerable to external shocks that are outside the control of Welsh Government.

### 2.2.1 Fruit & Vegetables

As perishable goods, fruit and vegetables are particularly vulnerable to supply chain shocks and changes in the labour market. For example, the inability of many large vegetable farms in east England to recruit enough workers is leading to crops going unpicked and rotting in the fields.

Within Wales there is clearly a deficit in fruit & vegetable production compared to what consumers currently buy, which itself is well below health recommendations. We currently produce just a  $\frac{1}{4}$  of a portion of vegetables in Wales per head of population. Overall the UK imports around 47% of its vegetables and 83% of its fruit, of which a significant amount comes from countries vulnerable to climate change, meaning that consumers are dependent on volatile international markets to secure affordable fruit & vegetables<sup>4</sup>.

Wales has a smaller proportion of land in horticultural production than other parts of the UK with around 0.1% of agricultural land currently used for fruit & vegetable production. This need not be the case. Research has found that if just 2% of Welsh agricultural land were used to produce fruit & vegetables, it would be possible to produce all of Wales' population's "5 a day" needs<sup>5</sup>.

Addressing this deficit will require consideration of who will grow the fruit and vegetables, how to incentivise them and remove existing barriers. A combination of financial support for new horticulture enterprises, training, planning reforms, local market development support and measures to increase land access are needed. Whilst the proposed Sustainable Farming Scheme does provide incentives for new horticulture enterprises and local market development, the level of support is not clear and other aspects are not covered.

---

<sup>4</sup> The Food Foundation (2020) Veg Facts 2020 <https://foodfoundation.org.uk/publication/veg-facts-2020-brief>

<sup>5</sup> Wheeler, A. (2018) 'A New Food Diplomacy: Participatory Action Research Findings of a Food System Approach to Public Health Nutrition', PhD Thesis, Prifysgol De Cymru/University of South Wales

### 2.2.2 Grains

Wales is also far from self-sufficient in grain for human consumption. Currently, the vast majority of Welsh arable production is for animal feed, a relatively inefficient use of land.

This was not always the case and enterprising farms, mills and bakeries are already leading the way producing nutrient dense bread and bring back sustainable local grain economies. For example, Y Felin Ganol near Aberystwyth grinds wheat from a neighbouring farm and sells direct to consumers as well as several small Welsh bakeries. The Grawn Hynafol Cymru (Heritage Grain Trial Wales) recently brought together farmers, millers and bakers from across Pembrokeshire and Ceredigion. Ten plots were used to grow different varieties of heritage and modern wheat which was milled and baked locally. More about this work and some of those involved can be found here. <https://www.sustainweb.org/realbread/articles/feb22-new-welsh-grain-revolution/>

Whilst there is a long way to go, these examples show that it is possible to increase our food security through local production and markets.

### 2.2.3 Meat

Whilst Wales is more than self-sufficient in meat, the decline in local abattoirs and butchers reduces local control of the supply chain, as well as having negative impacts on animal welfare and increasing food miles. Local abattoirs are a vital part of the local food economy - without them, local meat systems cannot exist, let alone thrive, but they are declining by roughly 10% per year. See section 7.2 for more on the reasons for this decline

## 3 Food Goals

We agree with the inclusion of food goals and in particular the primary goal being the goal is the provision of affordable, healthy, and economically and environmentally sustainable food for the people of Wales.

We agree that the Secondary Goals should cover the broad areas of economic well-being, health and social, education and environment including food waste. With respect to food waste, we see this as linked the broader environment goal and note that a key way to address it is through short supply chains that reduce the time between harvest and sales.

It is essential that the Food Goals be considered together, to avoid situations where one is pursued in isolation and incoherence continues. We would support an overarching requirement for the goals to be considered holistically when policies related to food are developed.

We support the inclusion of targets to achieve the Food Goals. These are essential for showing the direction of travel and can help give businesses the confidence to invest in changes that support the achievement of these targets.

We support the amendments set out in the Food Policy Alliance Cymru consultation response, which incorporates targets within the descriptions of the Food Goals.

If the goals remain the same; however, we propose the following amendments:

In the Environment goal description remove

*“Lessening environmental impacts of food production and consumption”*

And replace with:

*“transitioning to a food system that enhances rather than damages ecology and carbon sequestration”*

In the Education goal add provisions to include agroecological farming in both the curriculum and careers advice, and support accredited college level vocational training in sustainable farming.

## 4 Welsh Food Commission

We support proposals for a Welsh Food Commission, which should hold government to account and build integrated policies that transcend political cycles.

**Function:** More focus is needed on public consultation and enabling healthy choices.

We suggest changing section 10 (c) from:

*“(c) to keep the public adequately informed about and advised in relation to matters which significantly affect their capacity to make informed decisions about food matters;”*

To

*““(c) to keep the public adequately informed about and advised in relation to matters which significantly affect their capacity to make informed decisions about food matters; identify broader socio-economic factors that make healthier choices impossible; and seek input from the public in general, and key food system stakeholders in particular into policy making around food”*

10(f) and 10 (g) should be amended to reflect that the Commission should be driving the process of setting the goals rather than just acting as consultees and advisors.

**Composition:** We are concerned that the proposed process for selecting members may not create a sufficiently independent Food Commission with sufficient representation. As a minimum there should be an additional requirement to ensure cross sector representation on the Food Commission, including agroecological farming sector and local food system representatives, as these sectors will be crucial to achieving the Food Goals.

## 5 National Food Strategy

We believe that a National Food Strategy will be important for ensuring overall coherence and direction of policy related to food systems and address the problems identified in response to the section on why the legislation is necessary.

We agree that a key purpose of the National Food Strategy should be the implementation of the Food Bills and targets, as outlined in Section 12 (3).

We would add to this section an aim of ensuring that as far as possible the primary goal of the *“provision of affordable, healthy, and economically and environmentally sustainable food for the people of Wales”* can be met through food produced in Wales. This is important to increase our resilience as outlined in the section on why we need the legislation.

## 6 Local Food Plans

Whilst the Food Commission and National Food Strategy are essential for ensuring broad policy coherence, local plans are needed to ensure they are put into practice including through the development of local supply chains.

### 6.1 Resilient Local Food Systems

Local supply chains are crucial to tackling many of the challenges facing our food system. Not only do they reduce food miles and increase people’s connection and appreciation of the origin of food, but they also enable farmers to bypass supermarkets in order to get a better return on their food. Building local supply chains should therefore be at the core of the National Food Strategy, but the detail and delivery of these should be decided locally.

Local Government has control over various aspects related to the food system including in planning policy, setting business rates, food safety requirements, education, and public procurement. Furthermore, local government tends to have a better understanding of the needs of their area and what is already happening on the ground. Therefore, it is important that food policy be considered at a local as well as national level.

To ensure coherence and improve efficiency, Food Plans should be considered in tandem with Local Development plans and Wellbeing Plans. It is worth exploring where reporting is already required to ensure no need to double up.

We refer you to Vocal for Local, our report which includes case studies and policy recommendations for more on how resilient local food systems can be supported. <https://landworkersalliance.org.uk/wp-content/uploads/2021/07/Vocal-for-Local.pdf>

## 6.2 Collaboration

It is important that all relevant departments of local government are included. In particular, those dealing with health, welfare and social services, local taxation, procurement, planning teams and estates teams. The latter is important because consideration should be given to how land owned by local authorities, including county farms can facilitate Local Food Plans.

Other public bodies, community groups and local businesses should also be included. We believe that the Sustainable Food Places network provides excellent examples of how having dedicated staff focussed on working with local food businesses, farmers, community growers, food aid organisations and others can build resilience and create opportunities.

## 6.3 Resources

The Bill should include provision for sufficient resources. Local authorities are hard pressed to deliver existing obligations so to add these requirements onto them without adequate staff would set them up to fail .

# 7 Potential barriers to the implementation of the Bill's provisions

## 7.1 Planning policy

A key barrier to the Food (Wales) Bill achieving its aims is the planning system. This is an area where our members directly experience policy incoherence and frustration most often. The Bill in its current form does not address the planning system; an oversight that must be amended.

Planning policy for agriculture is often at odds with the stated aims of the Environment and Rural Affairs department both in terms of the ecologically destructive development that is allowed and development to facilitate agroecological farming and support rural communities, which is prevented or made difficult.

**Ecologically destructive farming permitted:** As noted above Welsh river ecosystems are at risk of destruction due to the proliferation of new intensive poultry units. This is despite the Environment (Wales) Act 2015 stating that public bodies need to ensure biodiversity is enhanced and the Sustainable Farming Scheme proposing to fund measures to improve biodiversity and water quality. These units receive consent despite clear evidence of the destruction they are causing because neither local or national planning policies give planners sufficient powers to block them or account for cumulative impact. Unless this is amended, all the money spent on incentivising farmers to increase biodiversity under the sustainable farming scheme, will have little overall benefit.

**Obstructing small agroecological farms:** At the other end of the spectrum, despite recent horticulture start up and development grants; getting planning consent for the

infrastructure that those grants aim to support is often extremely expensive and time consuming. Many fruit and vegetable farms in Wales are less than 5 hectares and therefore do not benefit from permitted development rights, despite being commercial farms. Without permitted development rights polytunnels, worker welfare units, storage barns, packing sheds and even small tool sheds require full planning applications which often require costly surveys; and even then, are often only successful at appeal.

**Rural Housing:** We cannot transition to more sustainable farming and we certainly cannot significantly increase our horticulture (which is the most labour-intensive agriculture per hectare) without affordable accommodation for those working on farms, both permanently and seasonally. The well documented impact of holiday lets has been felt by many of our members including: those seeking work on others' farms, but struggling to find affordable accommodation nearby (particularly between April and September when most seasonal work is required); those business owners struggling to recruit such workers; and those prospective new entrant entrepreneurs who need both land and affordable accommodation to start their land-based businesses.

There are three areas where changes to planning policies could address this:

1. Amending the One Planet Development (OPD) policy to make it more accessible.<sup>6</sup>
2. Reduce the burden of evidence required for agricultural workers' dwellings including the lack of affordability of alternative housing for farmers and farm workers and the difficulty of making a sufficient income from the farm is not a sufficient justification.
3. Requiring change of use for holiday lets: requiring homeowners to apply for change of use consent in order to turn their properties into holiday homes (as is required for Houses of Multiple Occupancy) would enable councils to protect housing for people living and working in the area.

## 7.2 Decline in abattoirs

As noted in section 2.2.3 the ability of local farmers to supply meat locally is constrained by the decline in local abattoirs. One of the reasons for this is that regulations designed for large scale abattoirs apply regardless of scale or risk. Small abattoirs present a lower risk due to the fact that the scale of any infection spread will be significantly lower and because traceability is much easier with a reduced number of customers. Nonetheless regulations require both a Food Safety Inspector and a vet to be present. Meeting the cost of this is challenging for small abattoirs, as the number of animals slaughtered per week is so low and vet shortages have made recruitment very challenging. Requirements for CCTV in abattoirs reduce the need for in person surveillance by a vet.

---

<sup>6</sup> Please see the One Planet Council (2022) *Review of One Planet Development In Wales , 2010-2021* <http://www.oneplanetcouncil.org.uk/review-of-one-planet-development-in-wales-2010-2021/> for more details on how this can be done.



## **8 Conclusion**

We welcome the opportunity to comment on the Food (Wales) Bill and believe that more cohesive policy making around food is needed in Wales. We need to move away from a food system that treats meeting our environment, health and livelihoods as separate, to one in which feeding people, providing dignified livelihoods and ensuring mental and physical wellbeing for all, are challenges that are addressed in conjunction with each other, and that meeting these needs does not come at the expense of the natural world.

Our staff and members would be happy to discuss this response in more detail or provide oral evidence to the committee. Please contact our Welsh Policy & Campaigns Coordinator on [holly.tomlinson@landworkersalliance.org.uk](mailto:holly.tomlinson@landworkersalliance.org.uk).