

Cyflwynwyd yr ymateb hwn i'r ymgynghoriad ar y Bil Bwyd (Cymru) Drafft

This response was submitted to the consultation on the Draft Food (Wales) Bill

FB006

Ymateb gan: | Response from: Cyngor Sir Fynwy | Monmouthshire County Council

If professional, name of organisation for which you are responding:

Monmouthshire County Council

Question	Response
Why is the Bill required	
Question 1: Do you agree with the overarching principles that the Bill seeks to achieve?	<p>The Bill is a welcome addition to policy in Wales. The overarching principles are clear and much needed to offer direction to the national food agenda. However, we feel that the Bill should include a clear definition of what 'sustainable' and 'sustainability' mean in this context. We would broadly support the wording of the UK National Food Strategy (2022, p. 7): 'a sustainable, nature positive, affordable food system that provides choice and access to high quality products that support healthier and home-grown diets for all'.</p> <p>While supporting the overarching ambitions of the proposed Bill, we suggest that the focus only on socio-economic wellbeing (para 18 of the Consultation Document) is perhaps too limited: environmental and social outcomes should also be part of the goal, and would help align the Bill more closely with the statutory obligations already set by the Wellbeing of Future Generations Act.</p>

	<p>We would also suggest that, instead of pursuing ‘enhanced consumer choice’ – which could be interpreted in a number of ways – a more equitable and sustainable ambition would be for the Bill to seek ‘more equitable access to healthy, environmentally friendly food’.</p> <p>It is also worth noting that our food system is global; if Wales is to stand as a truly responsible food nation, legislation should acknowledge the rights of habitats, animals, and people overseas as well as at home, and look to assure fairness throughout the supply chain. Some acknowledgement of this would be a welcome addition to the text of the Bill, and would be in line with recent policy around socially responsible procurement and eliminating modern slavery.</p>
<p>Question 2: Do you think there is a need for this legislation? Can you provide reasons for your answer.</p>	<p>We agree that there is a definite need for this legislation. Food systems issues are complex and cross-cutting: responsibility for aspects of food policy is split between numerous government departments, and effective action requires cooperation between public, private, and third sectors. A Food Bill would provide clarity of purpose and set the framework for integrated action to help create a food system that delivers for place, people, and planet.</p> <p>The current global context - climate change, Brexit, the Covid-19 pandemic, and international instability - is putting our current food systems under significant strain. National and domestic food security have been badly hit, and many households now struggle to put food on the table.</p> <p>Meanwhile, our global food system fills UK supermarket shelves, sometimes exploiting the people and environment of developing nations (e.g. through imports of fruit and vegetables, the UK consumed significant volumes of water extracted from water-stressed countries in Africa and southern Europe). Diet-related ill health is also a major cause for concern. These problems cannot begin to be addressed without clear leadership from Government.</p>

Food Goals	
<p>Question 3: Please provide your views on the inclusion of the Food Goals within the Bill as the means to underpin the policy objectives.</p>	<p>We welcome the inclusion of Food Goals to provide clarity and purpose, and to help shape delivery against the policy objectives.</p> <p>Having these clearly articulated goals will also assist in communicating the purpose of the Bill. This will be of particular benefit when working with stakeholders, as the food system is a complex topic.</p>
<p>Question 4: Do you agree with the inclusion of a Primary Food Goal supplemented by Secondary Food Goals?</p>	<p>Yes. The Primary Food Goal sets a clear and comprehensive vision, and the Secondary Food Goals break that down into clear areas for action. We note that, taken together, the Food Goals seem consistent with the existing policy context of the Wellbeing of Future Generations Act and the Environment (Wales) Act, and that they complement the wellbeing objectives of the Gwent Public Services Board (PSB).</p>
<p>Question 5: Are there additional / different areas you think should be included in the Food Goals?</p>	<p>We note that ‘sustainability’ is usually taken to comprise three elements: economic, environmental, and social. We therefore suggest including ‘social sustainability’ in the wording of the Primary Food Goal, alongside the economic and environmental sustainability already mentioned, i.e. ‘This is the overarching goal of providing affordable, healthy, and economically, socially and environmentally sustainable food for the people of Wales.’</p>
<p>Question 6: Do you have any additional comments on the Food Goals, including the resource implications of the proposals and how these could be minimised?</p>	<p>The themes identified by the Food Goals align closely with the focus of the Sustainable Food Places movement. This is a UK-wide movement campaigning for food system change through joined-up strategic thinking and food governance at local and regional levels. Making good use of this existing network would be a way of using existing resources efficiently in delivering the vision of this Bill.</p> <p>Sustainable Food Places (SFP) is coordinated by the Soil Association, Sustain, and Food Matters, with Food Sense Wales as the key delivery partner in Wales.</p>

Monmouthshire is a member of the SFP network, as are other local authority areas including Blaenau Gwent, Rhondda Cynon Taff, Cardiff, Vale of Glamorgan, North Powys and Carmarthen. Others are working towards membership.

A core component of the SFP framework is the cross-sector Food Partnership. Food Partnerships enable collaboration between public, private, and third sector organizations, acknowledging the complex, cross-cutting nature of the food system. There is considerable appetite for this way of working in Wales, and the established and rapidly developing network of Food Partnerships could be mobilised to help deliver the Food Goals.

It is important to acknowledge that food knows no borders, and in some instances a regional approach may be more effective when working towards the Food Goals (e.g. when considering environmental impacts and land-use change, it can be helpful to think in terms of river catchments).

There are existing examples of regional working: Torfaen CBC, Caerphilly CBC, and Monmouthshire CC have recently worked together to deliver the Community Renewal Fund project Food 4 Growth; urban-rural collaboration is encouraged through the Cardiff Capital Region and Cardiff Council and Monmouthshire CC are currently partnering in a Food Challenge; the Public Service Board operates at a Gwent-wide level; and with regard to Sustainable Management of Natural Resources, public bodies sit within the environmental areas identified in Natural Resources Wales's Area Statements. Thus, it would be encouraging to see recognition of this regional working in the Food Bill so that it can accommodate and encourage resource-sharing and collaborative approaches where these are deemed appropriate by the parties.

We note also that public sector bodies are not the only ones who will need support to bring about food-system

	change. Such change needs the whole supply chain to adapt its behaviour, and all actors will need support – particularly SMEs and lower-income households.
Question 7: Please provide your views on the inclusion of targets within the Bill as the means to measure how the Food Goals are being advanced.	<p>We welcome the inclusion of targets as a way of defining objectives and measuring progress, provided there is sufficient consultation before they are set.</p> <p>We note, however, that Wales enjoys a varied geography and demography and that these local variations should be considered in the setting of targets.</p>
Question 8: Do you agree with the process for setting the targets?	
Question 9: Do you think the reporting mechanisms set out in the draft Bill provide sufficient accountability and scope for scrutiny?	
Question 10: Do you have any additional comments on the targets, including the resource implications of the proposals and how these could be minimised?	
Wales Food Commission	
Question 11: What are your views on the need for a Welsh Food Commission?	We think that the Wales Food Commission would be a welcome addition to the food governance landscape, and is essential to give the legislation teeth.

	<p>It is significant that Scotland’s Good Food Nation Bill (passed 2022) likewise establishes a Food Commission as key to scrutiny and accountability.</p>
<p>Question 12: Do you agree with the goals and functions of the Welsh Food Commission? If not, what changes would you suggest?</p>	<p>We broadly agree with the goals and functions of the Welsh Food Commission.</p>
<p>Question 13: Do you agree with the size of the membership of the Food Commission and the process for appointing its members?</p>	<p>We would suggest that the phrasing of para. 43 be strengthened. The current phrasing is ‘In appointing an individual, the Welsh Ministers must have regard to the desirability of members having a range of skills and experiences.’ This seems insufficient to ensure that the Commission remains truly diverse and representative of the many interests at stake. We suggest rather that ‘Welsh Ministers must ensure that the Commission always represents a range of interests across society’.</p>
<p>Question 14: What are your views on the proposal that the chair and members can serve a maximum term of five years and that an individual may be re-appointed as a chair or member only once? Do you believe this is appropriate?</p>	<p>In governance terms this makes sense. However, a good Chair or member is often hard to find therefore perhaps the key thing here is to ensure that a job well done can be continued. It may be more appropriate to have a clause for measurement or indication of progress, or have means to remove a member if needed.</p> <p>There is also a continuity issue to consider: it would not be wise for multiple Commissioners to come simultaneously to the end of their terms as it may affect the longer term sustainability of the Commission. This could be a particular risk at the end of the first 5-year term and efforts should be made to avoid such an upheaval – e.g. by appointing the first set of Commissioners on staggered terms perhaps.</p>

<p>Question 15: Do you have any additional comments on the Food Commission, including the resource implications of the proposals and how these could be minimised?</p>	<p>We note that the effective functioning of the Commission will be crucial to the success of the legislation, and that it must therefore be adequately resourced.</p>
<p>National Food Strategy</p>	
<p>Question 16: Do you agree that there is a need for a national food strategy?</p>	<p>We think a coherent and robust national food strategy is vital to delivering a more sustainable and equitable food strategy, for the reasons outlined in questions 1 and 2 of this consultation. Such a strategy should be the result of thorough consultation with a range of stakeholders, paying particular attention to ascertaining the needs of populations considered ‘hard to reach’, who are often among those most adversely affected by food-system inequalities.</p>
<p>Question 17: Do you believe the Welsh Government’s current strategies relating to ‘food’ are sufficiently joined up / coherent?</p>	<p>Though Wales benefits from overarching legislation that sets a context for joined-up food policy (e.g. the Wellbeing of Future Generations Act; the Environment Act), and enjoys a strong ethos of partnership working, there is still some way to go in fully integrating the economic, health, social, environmental, and agricultural agendas. Each has different interest groups, which can pull in different directions and occasionally directly conflict (e.g. when negotiating the discourse around shifts in diet or land management). A carefully worked national strategy would be a step forward in reconciling these agendas to provide clarity to stakeholders and help secure a healthy, sustainable, and secure future for Wales.</p>
<p>Question 18: Does the draft Bill do enough to ensure that Welsh Ministers take advice and consult on the strategy before it is made. If</p>	<p>We suggest that in para. 65 the wording ‘persons they consider to be independent and to have relevant expertise’ is vague. It may be beneficial to specify certain sectors that must be consulted, representing diverse interests from the whole supply chain (e.g. the farming and horticulture</p>

<p>no, what additional mechanisms would you put in place?</p>	<p>community, businesses of all sizes, healthcare professionals, local authorities, consumers), while also allowing Ministers to exercise their judgement as to who else they wish to consult.</p>
<p>Question 19: Do you think the provisions of the draft Bill relating to reporting on the national food strategy are sufficient? If not, what changes would you like to see?</p>	
<p>Question 20: Do you think the provisions of the draft Bill relating to reviewing of the national food strategy are sufficient? If not, what changes would you like to see?</p>	
<p>Question 21: Do you have any additional comments on the National Food Strategy, including the resource implications of the proposals and how these could be minimised?</p>	
<p>Local Food Plans</p>	
<p>Question 22: Do you agree that there is a need for local food plans?</p>	<p>Yes, we agree that local food plans would be necessary to translate the national strategy into action at a the local level.</p>
<p>Question 23: Does the draft Bill do enough to ensure</p>	<p>As for question 18, it may be beneficial to specify certain sectors that must be consulted (e.g. the farming community,</p>

<p>that public bodies consult on their local food plans before they are made. If no, what additional mechanisms would you put in place?</p>	<p>business, healthcare professionals, local authorities), while also allowing public bodies to exercise their judgement in selecting who else to consult.</p> <p>We note that there is currently no requirement for any public consultation on the local food plan. Some kind of public engagement would seem appropriate given food is a fundamental part of everyone’s lives.</p> <p>From a local authority perspective, consultation is important as it is in keeping with the principles of democratic empowerment, place planning, and the legacy of the LEADER measure of the Rural Development Programme.</p>
<p>Question 24: Do you think the provisions of the draft Bill relating to reporting on the local food plans are sufficient? If not, what changes would you like to see?</p>	<p>We feel it is not clear from this consultation document how long public bodies would have to write their local food plans after the national strategy had been published. We would appreciate clarity on this.</p>
<p>Question 25: Do you think the provisions of the draft Bill relating to reviewing of the local food plans are sufficient? If not, what changes would you like to see?</p>	
<p>Question 26: Do you have any additional comments on local food plans, including the resource implications of the proposals and how these could be minimised?</p>	<p>As outlined earlier in this consultation response, utilising the established network of food partnerships would be an efficient way of using existing expertise and relationships to build, deliver, and monitor local plans. We also reiterate the point that it would be sensible to enable public bodies the opportunity to collaborate on local planning, so they were joined up in a coherent approach rather than each pursuing separate agendas. Many areas in Wales are already delivering against collaboratively produced Food Strategies</p>

	<p>and Action Plans, with others strategies are a work in progress.</p> <p>We would also emphasise that the food system goes well beyond the public sector, and that public bodies cannot bring about systems change without the support and initiative of the private and third sectors – and, indeed, of the individual consumer. To focus this Food Bill entirely on the public sector would therefore be a missed opportunity, and would compromise the Bill’s capacity to achieve its overarching ambition and the Primary Food Goal.</p> <p>We note that Welsh Government has recently announced significant funding to help develop cross-sector food partnerships in Wales; using those food partnerships to develop and deliver local food plans would seem an efficient use of public funds and a way of minimising the requirement for extra resources.</p>
<p>General Provisions</p>	
<p>Question 27: Do you agree with the list of persons defined as being a ‘public body’ for the purpose of this Bill?</p>	
<p>Question 27: Do you have any views on the process for making regulations set out in the Bill?</p>	
<p>Question 27: Do you have any views on the proposed commencement date for the Act?</p>	
<p>General Views</p>	

Please provide any additional information relevant to the draft Bill.

In general there is little to dispute in the necessity or content of the proposed ambition of this Bill.
We broadly welcome this proposed Bill and its objectives, and consider it a forward-looking and valuable addition to the Welsh policy landscape.