

FB010

Ymateb gan: | Response from: Rhwydwaith Ffermio er Lles Natur | Nature Friendly Farming Network

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 360 farmer members and 620 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. 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 and the rise in food insecurity
- 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.
- The overarching principles of the Bill are not strong enough on the environment and fails to reference the role of the Bill in tackling the nature and climate crises. 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](#): clean water, fresh air, plants and animals, fertile soil.
- 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. As such, the Bill must therefore avoid looking at Wales' food system in isolation.
- 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, as it requires a strong lead to negotiate integration of policies.

1. Why we need a monumental change in how we farm our land and feed our nation

1.1 The COVID-19 pandemic and the war in Ukraine have exposed the fragility of a food system close to breaking point. The costs of commodities have skyrocketed, and farmers are facing unprecedented input costs while navigating changes in domestic agriculture policies and labour shortages. Rising food prices will hit those vulnerable the hardest with the grim reality of increasing household food insecurity.

1.2 Food is a basic necessity and an essential ingredient for a good life, however today we find ourselves in a food system powered by fossil fuels and dominated by calorie-rich, nutrient-poor produce¹. 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 obesity² and the full social cost of obesity to Wales is around £3 billion a year³.
- 9% of people in Wales experience low food security whilst a fifth of people in Wales worry about running out of food.⁴
- Whilst we recognise that Welsh farming systems are far removed from the super-intensive farming systems prevalent across the globe - we mustn't forget that 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.
- Astonishingly, In Wales, some 400,000 tonnes of food are wasted each year. If just 1% of this is edible, it would be enough to provide the equivalent of over 9 million meals

1.3 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 such we need a systemic change that will positively shape food and farming to deliver genuine food security. 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.

1.4 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 as our only indicator of success. Farming can be the cornerstone of a fair and resilient food system that is vibrant and functional for citizens, farmers, rural communities, the economy, nature and climate. But to get there, we cannot afford to repeat past mistakes or delay our journey to the future.

As such, NFFN Cymru welcomes the introduction of a Wales Food Bill. 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 and the rise in food insecurity. To do this we need a systems approach to food-related policies to create synergies across government departments to achieve these ambitious policy targets.

¹ [Follow the Food: How modern food can regain its nutrients](#)

² [The primary care needs of people living with overweight and obesity in Wales: Summary](#)

³ [The annual social cost of obesity in the UK](#)

⁴ [Food Security in Wales](#)

2. Purpose of the Bill

2.1 We welcome that ensuring food security is a key overarching principle of the bill. However we would argue that the Bill should better define *food security*. We believe that achieving genuine, long-lasting food security depends on meeting the following interconnected dimensions.⁵

- **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

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. As such we believe that the Bill's overarching objective should include ensuring that all the above dimensions are met.

2.2 We are concerned that the overarching principles of the Bill are not strong enough on the environment and fails to reference the role of the Bill in tackling the nature and climate crises.

Food needs nature. Our resilience to a changing climate relies on ecosystems that can weather the storm, quite literally. Crops and animals need a functioning landscape to exist symbiotically to benefit our soil, water and air quality. As such food security can only be addressed if the soil, air, water and other natural resources that underpin food production, and are the foundation of healthy ecosystems, are of good quality.

Already many farmers across the UK are capitalising on nature's business benefits⁶. Research shows that integrating a diverse range of habitats and features on farmland can maintain and even increase yields⁷. For example, a largescale study found that incorporating nature friendly habitats on just 8% of arable farmland boosted the yield of flowering crops by 25% and resulted in no losses of yield for wind-pollinated crops due to an increase in pollinators and crop pest predators arising from wildflower margins and other habitats⁸. In livestock systems, a partnership with nature can bolster profitability and build resilience to external shocks by reducing inputs such as feed, fertiliser, housing costs and veterinary medication.⁹ Basically, if food is not produced sustainably, stability and utilisation are threatened, which risks long-term availability and access.¹⁰

⁵ [The case for a six-dimensional food security framework](#)

⁶ [Nature Means Business Establishing the Balance Between Food Production and Improving Nature](#)

⁷ [Long-term evidence for ecological intensification as a pathway to sustainable agriculture](#)

⁸ [Wildlife-friendly farming increases crop yield: evidence for ecological intensification](#)

⁹ [Less is more: Improving profitability and the natural environment in hill and other marginal farming systems](#)

¹⁰ [Food Security and Nutrition Building a Global Narrative Towards 2030](#)

Our modern food system has overlooked the golden thread between a stable climate, nature and food security. 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. For this to happen, all its assets must be recognised and managed well, with all outputs rewarded as part of a fair food and farming system. This is imperative to secure thriving businesses and the best outcomes for society. Building genuine, long-lasting food security spans beyond the farm gate, but this is where change begins from the farm ground up.

2.3 The consultation document outlines the purpose of the Bill, which is to;

“establish a more sustainable food system in Wales to strengthen food security, improve Wales’ socioeconomic well-being, and enhance consumer choice.”

In addition to the points regarding food security dimensions and a lack of emphasis on environmental sustainability, we also note that establishing a **more** sustainable food system is not the same as establishing a **truly sustainable** food system. The language and ambition certainly require strengthening here. Instead of just reducing harm to the environment, Wales’ food system should contribute positively to the environment through promoting agroecological and nature friendly approaches.

2.4 Furthermore, 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.¹¹ 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.

2.5 The challenges we face because of an unsustainable food system cannot be addressed via individual Government departments working in silos - we need overarching vision and coordination.

As such we welcome the following commitment.

“The draft legislation also seeks to provide a framework that enables a coherent, consistent and strategic cross-governmental approach to policy and practice on all aspects of the food system”.

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.

¹¹ [Wales And Global Responsibility Addressing Wales’ Overseas Land Footprint](#)

3. Primary Food Goals

- 3.1 The NFFN welcomes the idea of having a primary food goal, however we believe that the current definition is too vague, subjective and open to interpretation;

“The primary food goal is the provision of affordable, healthy, and economically and environmentally sustainable food for the people of Wales.”

We would argue that the primary food goal should refer to the interconnected dimensions of *food security* as listed in paragraph 2.1. Fundamental to this is adopting an agroecological approach to food production and the wider food system.

4. Secondary Food Goals

- 4.1 Whilst we are glad to see that the environment is one of the secondary food goals, we would argue that *lessening the environmental impacts of food production and consumption* is not ambitious enough. One could argue that “lessening” is akin to “damage limitation” – however we need to move beyond this and facilitate proactive ecosystem restoration if we are to achieve food security.
- 4.2 Food waste targets should not be limited to food producers and consumers, but also include the wider food supply chain and retail. Waste can be found in every facet of the food supply chain: from farm fields to food manufacturing, hospitality, retail and households. In the UK, around 9.5 million tonnes of food were wasted in 2018 post-farmgate, equating to roughly 15 billion meals with an estimated value of £19 billion and accounting for 36 million tonnes of greenhouse gas emissions.¹² This volume of wasted food and drink would require an area close to the size of Wales for production. 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.¹³
- 4.3 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. These targets, which would be set by the Food Commission, include;
- 1) **Food for all:** Wales becomes the first nation to eliminate the need for food banks. Everyone in Wales has access to the food they need in a dignified way, to live a healthy life.
Target: Zero requirement for food banks in Wales by 2030
 - 2) **Food for public health:** Increased consumption of vegetables, which are produced sustainably in Wales for Wales. Educational provision on food related issues in each key stage in all schools.
Target: 75% of Eatwell’s recommended vegetable consumption is produced sustainably in Wales by 2030
Target: 100% of schools including food in Key stage 1-3 curriculum
 - 3) **Net zero food system:** A net zero food system for Wales.
Target: Net zero emissions from Wales’ food system by 2035.
 - 4) **Farming for nature and climate:** Increased amount of agro-ecological production. Measure the environmental footprint of food and set a target to reduce the environmental footprint of food production and consumption.

¹² [Food surplus and waste in the UK – key facts](#)

¹³ [Wasting Food Feeds Climate Change](#)

Target: 100% agroecological production by 2035

Target: 75% reduction in environmental footprint of food production and consumption at home and overseas by 2035.

- 5) **Sustainable food procurement:** Increased public procurement of food from organic or agroecological Welsh producers. Strategies for ensuring adequate supply and fit-for-purpose dynamic procurement tools should be addressed in the roadmap.

Target: 30% of public procurement of food is from organic or agroecological Welsh producers by 2030

- 6) **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. Work, whether on land or sea, is free from exploitative practices, and is varied, engaging and empowering. Achieving cannot be achieved by focussing solely on individual businesses or by simply mandating higher wages, but requires analysis of the market structure in the food system that leads to low wages in farming and the food sector.

Target: 100% of food sector jobs paid the real living wage by 2030

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

5. Food Commission

- 5.1 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, as it requires a strong lead to negotiate integration of policies.
- 5.2 A National Food Commission, led by a Commissioner should be tasked with overseeing and delivering a co-produced National Food System Vision and Roadmap that aligns with agroecological principles and includes an action plan for achieving set targets. The Food Commission will collaborate with Ministers to ensure that new strategies and policies align and are integrated with established policies and strategies to provide that every person has access, in a dignified and culturally appropriate manner, to nutritious, sustainable and safe food at all times.
- 5.3 A Food Commission must include a wide variety of expertise to that encompass the 6 interconnected dimensions of food security and should avoid emulating past policies that over-focus on production at the expense of sustainability and viability. It's also important that the voices of farmers and growers on the ground are heard, with plenty of opportunities for stakeholder engagement.

Conclusion

NFFN Cymru welcomes the introduction of a Wales Food Bill. At its core, the Bill should set out to achieving genuine, long-lasting food security by ensure effective integration of production, supply and consumption policies across Government. In the context of future food security issues, tackling the nature and climate crises is vital to reduce the risks of production failures, food shortages and subsequent economic costs.
