

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](#)

FB012

Ymateb gan: | Response from: Cultivate

1. Do you agree with the overarching principles that the Bill seeks to achieve?

Comment: Yes, but we believe the links to the health and well-being benefits provided by good quality, local food needs more emphasis.

2. Do you think there is a need for this legislation? Can you provide reasons for your answer

Comment: We agree with statements accompanying this consultation, these being: That there is a general lack of scrutiny of policy related to the wider food system in Wales (and elsewhere). Food policy is too often thought of in silos, with Welsh Government departments taking different approaches to food policy; thus resulting in policy aims that can often contradict each other. Despite the importance of food (and the wider food system) to health and wellbeing, as well as socioeconomic development amongst other things, public bodies have been found to have very different and inconsistent attitudes towards food policy within their own remit. We also believe that the links between a good and fair food system for all needs more emphasis on the health and well-being aspect and how this impacts on higher-level health impacts.

3. Please provide your views on the inclusion of the Food Goals within the Bill as the means to underpin the policy objectives.

This is a good way to underpin the policy objectives.

4. Do you agree with the inclusion of a Primary Food Goal supplemented by Secondary Food Goals?

Yes

5. Are there additional / different areas you think should be included in the Food Goals?

Primary Food Goals – **Comment:** There is no mention of 'accessibility' to sustainable food within the primary food goals. We believe that it is very important to specifically state 'accessibility' within the Primary Food Goal, because no matter how good the intentions are, if people (such as those on low incomes or rurally isolated) cannot access a sustainable food system, then we are leaving vital audiences behind.

Secondary Food Goals

- i. Economic well-being. **Comment: Could this be linked to a living wage or a fair wage for all?**
- ii. Health and Social. **Comment: Could this be strengthened to, "Physical and mental health and wellbeing and social cohesion"?**
- iii. **Comment: There are no specific mentions in the secondary food goals of: food poverty, food procurement, and climate and nature emergency through sustainable food and farming.**

6. Do you have any additional comments on the Food Goals, including the resource implications of the proposals and how these could be minimised?

The draft Bill places a duty on “public bodies” to take reasonable steps to advance the primary food goal and the secondary food goals. For the purposes of the draft Bill, “public bodies” means the Welsh Ministers, a local authority, or a Local Health Board. **Comment:** Is it clear whether the Local Authority or the Local Health Board is to take the lead on delivering the primary and secondary food goals? Or is this to be determined by each Local Authority, area by area?

Resource implications: **Comment:** There is already a network of Sustainable Food Partnerships (SFP) across parts of Wales with an aspiration for every Local Authority in Wales to have an SFP.

Underpinning the SFPs is the organisation, “Food Sense Wales”. This network is already helping to delivery many of the aims of the Food (Wales) Bill and has access to many partners and shared resources and learning. Food Sense Wales and SFPs could help deliver many aspects of the Food (Wales) Bill with less resources than starting from scratch.

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.

This is a good system

8. Do you agree with the process for setting the targets?

Yes

9. Do you think the reporting mechanisms set out in the draft Bill provide sufficient accountability and scope for scrutiny?

Yes

10. Do you have any additional comments on the targets, including the resource implications of the proposals and how these could be minimised?

For resource implications, see comment under question 6 above

11. What are your views on the need for a Welsh Food Commission?

Comment: We agree that a Welsh Food Commission or equivalent body is needed in order to monitor the delivery of the food goals and targets set in each area. Will this Commission have the same or similar powers of scrutiny as the Food Commission set up in Scotland via its Food Bill?

12. Do you agree with the goals and functions of the Welsh Food Commission? If not, what changes would you suggest?

Yes

13. Do you agree with the size of the membership of the Food Commission and the process for appointing its members?

Yes – could a member of Food Sense Wales be included as a member of the Food Commission to represent the Sustainable Food Partnerships?

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?

Comment: This seems a reasonable balance and would ensure new members/views are taken on board periodically whilst allowing enough time to build long-term relationships, knowledge and understanding.

15. Do you have any additional comments on the Food Commission, including the resource implications of the proposals and how these could be minimised?

For resource implications, see comment under question 6 above

16. Do you agree that there is a need for a national food strategy?

Yes – a national food strategy that underpins all work programmes is essential.

17. Do you believe the Welsh Government's current strategies relating to 'food' are sufficiently joined up / coherent?

Comment: No. There is a definite disconnect between sustainable food strategies, policies and delivery mechanisms, the health and well-being agenda (including food poverty; social prescribing; community cohesion; health strategies and policies such as "Healthy Weight, Healthy Wales"); agriculture and diversification of agriculture within the farming sector; accessibility and community transport; the fair wage/living wage agenda; education, training and skills; and procurement strategies. Hopefully the Food (Wales) Bill and proposed Food Strategy for Wales will help draw all these different elements and strands together, rather like the catchment-wide plans for river basins. If all these elements are brought together, from the Welsh Government down to local delivery plans, more funding opportunities will be afforded, and more benefits will be accrued.

18. Does the draft Bill do enough to ensure that Welsh Ministers take advice and consult on the strategy before it is made. If no, what additional mechanisms would you put in place?

Comment: Unsure

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?

Yes

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?

Yes

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?

For resource implications, see comment under question 6 above

22. Do you agree that there is a need for local food plans?

Yes

23. Does the draft Bill do enough to ensure that public bodies consult on their local food plans before they are made. If no, what additional mechanisms would you put in place?

Yes, but could Food Sense Wales be included as a key public body?

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?

Yes

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?

Comment: It is not clear whether a Local Authority or a Local Health Board will be the public body leading on the delivery of Food Plans – could this be made clearer? Or is it purposefully written like this to give flexibility LA area by area?

26. Do you have any additional comments on local food plans, including the resource implications of the proposals and how these could be minimised?

For resource implications, see comment under question 6 above

27. Do you agree with the list of persons defined as being a ‘public body’ for the purpose of this Bill?

Comment: Could the National Farmers’ Union be added as a key public body?

28. Do you have any views on the process for making regulations set out in the Bill?

29. Do you have any views on the proposed commencement date for the Act?