

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](#)

FB013

Ymateb gan: | Response from: Maint Cymru | Size of Wales

---

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

Yes. However, we feel that the overarching principles of the Bill are not strong enough on the environment. Firstly, aiming to establish a more sustainable food system, as opposed to a establishing a sustainable food system, could essentially imply ongoing (if reduced) unsustainable activity. We would suggest that the wording for the principles in the Bill is more explicit on the need to both restore nature and mitigate and tackle climate change in Wales.

We also believe that the overarching principles of the Bill must also consider Wales' global responsibility. In other words, it is essential that the impact of Wales' food system beyond Wales is considered and that future food legislation and policy serves to eliminate unsustainable practices here and overseas.

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

Yes, there is an urgent need for this legislation.

According to WWF Cymru's Report "A Welsh Food System Fit For Future Generations" 2020 report "our food system is vital for future generations to better safeguard their health and livelihoods, and environmental well-being which supports this. Yet at the moment, the global food system also forms a threat to future generations through its dysfunctional production, distribution and consumption practices which endanger health, contribute to the nature and climate emergencies and food insecurity".

[https://www.wwf.org.uk/sites/default/files/2020-03/WWF\\_Full%20Report\\_Food\\_Final\\_3.pdf](https://www.wwf.org.uk/sites/default/files/2020-03/WWF_Full%20Report_Food_Final_3.pdf)

Currently, a significant amount of our food is imported from countries and regions with a high risk of tropical deforestation, habitat conversion and social impacts, e.g., the abuse of Indigenous Peoples rights and forced and child labour. This includes commodities such as beef from South America, soy and palm oil used as livestock feed, palm oil for human consumption, coffee and cocoa. Deforestation accounts for around 20% of global emissions and we cannot address climate change without addressing deforestation. Unsustainable production of these forest-risk commodities is not only driving climate change and biodiversity loss, but it is also increasing the risk of future pandemics.

Research commissioned by Size of Wales, WWF Cymru, RSPB Cymru, [[https://cdn.sizeofwales.org.uk/wp-content/uploads/2020/11/wwf\\_risky\\_b\\_wales.pdf](https://cdn.sizeofwales.org.uk/wp-content/uploads/2020/11/wwf_risky_b_wales.pdf)] shows that Wales' food sector has a large deforestation footprint. For example,

- Wales' imports 190,000 tonnes of soy a year. Soy 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%). 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. Greenhouse gas emissions from land use change, such as deforestation, for growing Welsh imports of soy total over 1.1 million tonnes of CO<sub>2</sub>e each year.
- Palm is mostly imported into Wales in the form of palm kernel expeller and oilcake (53% of total), which is an ingredient in livestock feed. A further 27% of imports are palm oil, which is used in many processed foods, such as biscuits, cakes and confectionary, and personal hygiene products (e.g., soap). Welsh palm imports total 51,000 tonnes a year 37% of the palm Wales imports is grown in Indonesia, where land use change associated with its production totals 168,500 tonnes of CO<sub>2</sub>e each year. 85% of the palm import land footprint falls in countries that are high or very high risk for deforestation and/or social issues, including Indonesia, Malaysia, and Papua New Guinea. This makes palm the highest risk commodity that Wales imports.
- Most beef imported into Wales is fresh or chilled (53%). The rest is frozen or in processed meat products such as corned beef. Welsh imports total 12,000 tonnes of beef equivalent each year. Welsh beef imports require a land area the size of the Brecon Beacons every year. 26% of the beef import land footprint falls in countries that are high risk for deforestation and/or social issues, including Brazil and Australia. Welsh imports of beef account for 5% of the UK's total beef imports, which is comparatively high considering Welsh share of UK GDP and population. Wales has a higher proportion of its beef land footprint in Brazil compared to the rest of the UK (15% of total versus 12%). This is due to higher levels of corned beef consumption in Wales, which nearly always comes from Brazil.
- Welsh annual imports of cacao total 15,000 tonnes. Greenhouse gas emissions from land use change associated with the production of cocoa for Welsh imports total 68,800 tonnes CO<sub>2</sub>e each year. Wales imports the majority of its cocoa from West African countries, where there are risks of deforestation and social issues, such as child labour. Welsh consumption of cocoa products is slightly higher per capita than the rest of the UK.

Climate and nature-friendly food, grown or reared locally, would not only help make our food system more resilient to global impacts (e.g. climate crisis, the war in Ukraine, COVID pandemic), improve access to healthy food helping to tackle health inequalities and disease, create local employment and support a just transition, but it would also help protect these fragile, life-giving ecosystems and forest communities overseas.

As the consultation highlights, there is no consistency in approach across Welsh Government departments and public bodies, meaning that implementation of food policy is patchy and fragmented. This is also the case for the implementation of the seven wellbeing goals described in the Wellbeing of Future Generations Act (2015), in particular, Global Responsibility (GR). We believe this Bill would not only support a consistent approach to food policy, but with the right targets in place, it could also help public bodies contribute to the GR goal, for example, through the use of ethical certifications, such as Soil Association

Organic or Pasture for Life, which would remove or significantly reduce the use of deforestation-risk soy and palm-based feeds in meat and dairy products.

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

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

Yes. However, in the draft text we feel the primary goal is weak in its definition, giving it would be the primary focus of the legislation. More definition is needed at this higher level to avoid ambiguity – for example, we should not support more food production at the expense of degrading our environment and wellbeing. We would like the primary goal to be explicit on the need to restore nature and mitigate and tackle climate change in Wales and overseas, and the crucial role that the food system needs to play in enabling this, and we believe that agroecological principles should underpin the primary goal. The primary aim should be to provide a legislative framework that enables policy coherence across the food system guided by agroecological principles.

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

We propose that the secondary food goal refers to the four wellbeing goals as outlined in the Wellbeing of Future Generations Act (Wales) 2015 as outlined in WWF Cymru's Report "A Welsh Food System Fit For Future Generations" 2020.

[https://www.wwf.org.uk/sites/default/files/2020-03/WWF\\_Full%20Report\\_Food\\_Final\\_3.pdf](https://www.wwf.org.uk/sites/default/files/2020-03/WWF_Full%20Report_Food_Final_3.pdf)

As outlined in question 1, our food system is having a global impact both in terms of environmental and human / social and cultural rights. Therefore it is essential to include global responsibility in the primary and secondary food goals.

While you have an Environment goal, you may also want to include a Biodiversity goal, or change it to Environment & Biodiversity. The environment goal is described as "Lessening environmental impacts of food production and consumption", which could relate to issues such as land-use change, water pollution and carbon emissions for example. The term 'environment' is rather open to interpretation, so it is important to have clarity. Given that the climate and biodiversity crisis are interlinked they cannot be tackled independently of one another. Biodiversity targets could not only support more climate and nature friendly food, but also promote a greater genetic diversity of plants to support healthy gut microbiomes and help build food system resilience. The Environment goal description is also just about reducing impacts. There should also be the intention to support regenerative methods of food growing/production. Instead of just reducing harm to the environment, Wales' food should contribute positively and include a proactive / positive environment (and biodiversity) goal that promotes/increases regenerative approaches like nature-friendly farming, agroforestry, agroecology, permaculture etc.

For Health and Social goal, the Bill should also include reference to the importance of how a food system can tackle the mental health impacts of food insecurity.

The Bill should also refer to how a Wales' food system will contribute to “a Wales of Vibrant Culture & Welsh Language” as outlined in the Wellbeing of Future Generations Act. Food is used to celebrate our heritage and Welsh language. Food is recognised as a fundamental part of the ‘Foundational Economy’, enabling local communities to regenerate and become more socially and culturally vibrant.

Under economic well-being, reference should also be made to equality. Everyone in Wales should have access to healthy, affordable food that are culturally appropriate. Reference should also be made to the inclusion of ethnic minority groups.

The Wales Food Bill would benefit from having ambitious targets on the face of the Bill to drive action and align with the Well-being of Future Generations Act. We suggest alternative Food Goals developed by the Food Policy Alliance Cymru.

**(i) 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, in order to live a healthy life.

Target: Zero food banks in Wales by 2030

***(ii) 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

***(iii) Net zero food system***

A net zero food system for Wales.

Target: Net zero emissions from Wales' food system by 2035.

***(iv) Farming for nature and climate***

Increased amount of agro-ecological production.

Measure the environmental footprint of food at home and overseas and set a target to reduce the environmental footprint of food production and consumption.

Target: 100% agroecological production by 2035

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

### ***(v) 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

### ***(vi) 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

Each of the above goals represents an integrative piece of work and relies on collaboration between Ministers and government departments to achieve a coordinated approach. This coordinated approach should be overseen and mediated by the Food Commission, whereas each Minister will have a duty to collaborate to work to reach targets. It is important to note that goal four would address the overseas environmental and social impacts of Wales' food system.

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

We believe the food waste goal will be crucial in helping to reduce costs. Food production uses vast amounts of resources, including land, water and energy, and huge gains can be made, both environmental and financial, by reducing waste. A good example of this is the Copenhagen model, where almost 90% of the food sourced for municipal meals is organic and all within the same budget, thanks to investment in training and food storage improvements in public kitchens, as well as joined-up working between food producers and the city administration.

Education targets should include campaigns to inform public sector bodies and the public about the impact of un-sustainably produced food on ecosystems and how biodiverse, healthy functioning ecosystems are vital for the provision of ecosystem services, including food provision, water purification and climate regulation. And the health and social goal should include targets relating to access to community food growing opportunities and learning, e.g. community supported agriculture and support establishing food co-ops.

If the draft Food (Wales) Bill does become legislation, further funding may need to be made available for local organisations such as Local Authorities and Health Boards in order to be compliant with the primary and secondary food goals.

**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.**

We agree with the inclusion of targets to measure implementation of the secondary food goals. Please see our answer to question 5 which outlines what those targets should look like.

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

The process for setting the targets should be led by the Food Commission in co-production with food system stakeholders. The commission should be tasked with recommending targets from the co-production process to the Ministers for approval. It is important that civil society groups are consulted and also minority ethnic groups.

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

Like the Wellbeing of Future Generations Act Wales, reporting alone does not mean there will be decisive action across each of the goals. What are the consequences if a public sector body fails to act? There should be a minimum requirement to ensure progress is made in reducing commodities that drive deforestation, nature loss and social impacts.

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

No

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

This is essential. A Welsh Food Commission composed of members who understand the food, environment and policy landscape in Wales, will be key in helping to shape sustainable food production, equitable access to healthy, nature-friendly food and influencing outcomes across sectors - e.g. public, private and community.

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. In light of the five ways of working of the Well-Being of Future Generations Act, including involvement, integration and collaboration, there is a legal mandate to engage with as wide a range of actors within the food system as possible to build the National Food Strategy. The Commission would present a draft Strategy, based on co-production principles, to Welsh Ministers for approval.

**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. There needs to be a mechanism that ensures a good range of voices and diversity are represented on the commission.

**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?**

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

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

Yes. We very much welcome that the draft Bill intends 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. A national food strategy could be core to achieving this joined up approach.

As rightly noted in the bill, 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. We cannot deal with agriculture alone and not the other parts of the food system. We have to deal with food production, consumption and everything else in between in a joined-up manner if we want to ensure that one policy in one food area doesn't have unintended consequences for another food area.

A clearly articulated overarching National Food Strategy needs to connect with policy across departments that can support its delivery. A food systems approach provides an ideal opportunity to integrate sectors and demonstrate a system that can deliver a wide range of benefits under each of the Well-Being of Future Generations Act seven well-being goals, and apply the sustainable development principle when thinking of the long term, prevention, integration, collaboration and involvement. We also agree that public bodies have been found to have very different and inconsistent attitudes towards food policy within their own remit.

We believe that the national food strategy should be guided by agroecological principles. Strengthening the overarching principles of the bill, as well as the primary and secondary goals of the bill, to ensure they are guided by agroecological principles, will, in our view, enable the development of a coherent and effective national food strategy.

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

No - we agree with the Sustainable Places / WWF report.

**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?**

Given that Wales imports a significant amount of forest-risk commodities, such as soy from South America to feed Welsh livestock and corned beef from Brazil,\* under section 13.3, Ministers should also have regard to the United Nations Declaration on the Rights of Indigenous Peoples and the right of Free, Prior and Informed Consent relating to activities on Indigenous lands.

\* Wales has a higher proportion of its beef land footprint in Brazil compared to the rest of the UK (15% of total versus 12%). This is due to higher levels of corned beef consumption in Wales, which nearly always comes from Brazil. [[https://cdn.sizeofwales.org.uk/wp-content/uploads/2020/11/wwf\\_risky\\_b\\_wales.pdf](https://cdn.sizeofwales.org.uk/wp-content/uploads/2020/11/wwf_risky_b_wales.pdf)]

We think that Welsh Ministers seeking advice from the FG Commissioner should be a requirement. If one of the intentions behind this Bill is to take a joined-up approach across policies and prevent working in silos, it makes sense to make this a requirement. Also, the Commissioner will be advocating on behalf of future generations, so important to include.

**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?**

We would like to see it made explicit that there would be reciprocal and good communication and support between a food commission and local food partnerships, to ensure that there is consistent and even progress at a local level. Other relevant commissioners (e.g. Future Generations Commissioner), must be consulted as opposed to 'may be consulted'.

**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?**

**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?**

The national food strategy will need to lay out steps for minimising environmental and social impacts in the global supply chains that feed Wales and Welsh livestock, e.g. through the use of ethical certifications, such as RSPO physically certified palm oil and Fairtrade, and by working with farmers in Wales on the issue of embedded soy and palm oil in animal products.

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

Yes. Public bodies have different remits and will take different paths to meeting the food goals/targets. It makes sense to have tailored approaches depending on need/consumption. Ownership of the plans may also help to galvanise action.



**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?**

There is a need for a co-productive approach to developing local food plans. This could be done via citizen assemblies and other forms of citizens' engagement. Furthermore, we would like to see the inclusion of relevant third sector representatives as consultants on the development of food plans, particularly NGOs working on food and farming, forest-risk commodities and ethical procurement. The language uses the terms 'may consult' which does not go far enough to ensure the local food plan is developed in true partnership with the public body and the communities they serve.

**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. Local and regional public procurement – for example in schools, hospitals and council offices – can help create markets for local food businesses. Public Service Board Well-being Plans should include public value criteria around environmental, welfare and nutritional standards in food production. We would also like to see it made explicit that local food plans can be developed and delivered via local food partnerships.

**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?**

Yes

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

Food infrastructures need rebuilding. To support local supply chains and rebalance the distribution of power, infrastructure is needed in towns and the countryside to link food producers to consumers in more diverse ways. This means more sites for food markets, community retailers and food processors, investment in food cooperatives and the development of a network of food hubs that aggregate and distribute local food. Local authorities should be required to make plans for developing food hubs, which could facilitate local and regional provisioning and procurement for the public sector as well as private buyers.

Public Service Board Well-being Plans should include public value criteria around environmental, welfare and nutritional standards in food production. Other policies developed by local authorities, NRW and other PSB members, including planning, procurement, education and others should be reviewed to ensure coherency with the Local Food Plans. For example, local development plans and planning policy should be amended to ensure it supports sustainable local food production; but prevent ecologically harmful agricultural development.