

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](#)

FB014

Ymateb gan: | Response from: Ymgyrch Diogelu Cymru Wledig | Campaign for the Protection of Rural Wales

---

Please find below a formal consultation response from the Campaign for the Protection of Rural Wales (CPRW) on the proposed draft legislation The Food (Wales) Bill proposed by Peter Fox MS. In line with the consultation briefing, we have only addressed those questions that are pertinent. CPRW is happy to provide further evidence towards the development of this Bill, should it proceed to Committee stage at the Senedd.

### **Consultation questions:**

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

Yes, CPRW strongly believes there is a need to ensure a more sustainable, joined up food strategy, which increases food security that also benefits producers and consumers across Wales.

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

Yes. There is a need for legislation such as this and other more robust legislation to combat food wastage, excessive packaging and better management of waste by-products in the production of goods and the raising of livestock.

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

Food Goals give a clear indication of the primary and secondary objectives of this Bill and its aims

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

CPRW is not convinced of the need to separate the two goals and believes that these should be written into one central aim. The land use and social aims should be unavoidably considered as part of the productive process. Specialised output of quality products as recognised in the concept of protected geographical indicators should be encouraged.

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

More detail is needed on how these goals will be encouraged and upheld by “public bodies”

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

N/A

**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.**

More detail is needed on how the food goals will be advanced

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

N/A

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

N/A

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

N/A

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

CPRW sees the merits in having a commission that can monitor the roll out of the food plan, overarching food strategy for Wales and hold public bodies, local authorities and the Minister to account if food goals are not being achieved. The Minister could implement this and be held accountable to the Senedd and its relevant committees, however, the Minister would lack hands-on experience of how this is being rolled out unless members of a commission could include a fair cross-section of relevantly experienced individuals. Wherever possible, the process should be guided by incentives and advice so that undue regulation is avoided.

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

CPRW broadly agrees with the aims of the proposed goals and functions of a Welsh Food Commission, however, it believes there is an opportunity to increase the scope of the commission to look at ways to reduce pollution and waste by-products from the growing of produce and raising of livestock from being released into the environment.

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

N/A

**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?**

N/A

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

Where members of the commission are selected from a fair geographical spread of the country, efforts must be made to meet online to reduce incurred costs.

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

Yes, CPRW strongly believes that more action is required to ensure that we safeguard our food supply for the future, regulate buying policies for large produce buyers to

minimise waste, minimise packaging, respect the physical environment, and uphold animal and waste management best practice standards.

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

The WG has not demonstrated that its current strategies are joined up or coherent. If the scope of this Bill is already within the purview of the Minister and the Welsh Government, it is difficult to understand why they are already being implemented.

**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?**

CPRW believes that this Bill and its aims should direct the Ministers and their office to implement the objectives and strategy of this Bill. To that end there should be an annual written and oral statement from the Minister to the Senedd on how and if they have worked to meet the goals with the Commission's commentary on that - this will allow Members of the Senedd to scrutinise the working relationship and discover whether goals are being met.

**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?**

See previous answer to question 18.

**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?**

See previous answer to question 18.

**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?**

This Bill and its aims could simply place a duty on the Ministers and their office without the need for a commission, if costs were too great.

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

Yes, CPRW agrees that local food plans are needed to ensure that the Food (Wales) Bill is tailored for local areas, with all the complexities that come with differing food producers & consumers in each area.

**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?**

N/A

**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?**

N/A

**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?**

N/A

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

N/A

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

The list of 'public bodies' could be extended to include any organisation that receives funding from public funds.

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

N/A

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

N/A

**General Views 86) We have asked a number of specific questions throughout this consultation document. If you have any related issues which we have not specifically addressed, please provide details of these in your response.**

CPRW believes that this Bill could and perhaps should address the following aspects into a food strategy for Wales:

### Provenance

- Clear labelling of food to indicate provenance, including a percentage of origin if processed food is being advertised.
- Labelling should be used to indicate the type of farming involved to produce the product, including if it is organic, free-range or intensive farming
- Animal welfare good practices should be indicated on the labelling of the product (where appropriate)

### Food Packaging

The Bill should legislate to make excessive packaging of food products illegal. As in France (<https://www.bbc.co.uk/news/world-europe-59843697>). This will cut down on costs, packaging waste, and litter.

### Aesthetically imperfect products

This Bill should legislate to make it harder for food buyers to refuse aesthetically imperfect produce. This will help reduce waste and increase food supply.

### Food Waste

This Bill should propose that we make it illegal for supermarkets / large produce buyers to 'throw away' food, instead donating this food to schools, food banks and other outlets. This was introduced in France in 2016

(<https://www.theguardian.com/world/2016/feb/04/french-law-forbids-food-waste-by-supermarkets> ). This will cut down on waste and the amount of food that reaches our landfill sites.

### Repay best practice

Awards or other forms of recognition should be given to those producers who uphold the best practice for animal welfare, waste management, sustainable practices and promoting biodiversity. Taking the Red Tractor badge further, this Bill could incorporate

more targets to reach the aforementioned best practices to gain another level of quality products.

#### Air Miles Tariff

In order to both combat carbon waste and promote local producers the Bill should indicate that an "Air Miles" tariff be placed on food products from overseas - the further it travels the higher the tariff.