

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](#)

OSFB007

Ymateb gan: | Response from: FareShare Cymru

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## Overarching principles

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

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Yes

We agree that a more sustainable food system that strengthens food security, improves socio-economic wellbeing and consumer choice would be good for Wales. As an organisation that redistributes good quality surplus food to third sector organisations in Wales that feed people in need, we have seen demand for our services increase over the pandemic and continue to increase due to the cost-of-living crisis.

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

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Maybe

We can see the role of the legislation in creating a holistic framework for future food policy and agree that this is needed, as the current food action plan does not cover all aspects of food. We also recognise the success of the Scottish Good Food Nation Act.

## Food Goals

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

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We agree that there is a need to provide a way of measuring the impact of the food bill and the food goals seem a sensible way to do this.

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

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We agree that these seem to be sensible areas to be covered by goals. However, more detail on each of these is required. What is covered by Health and Social for example.

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

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This is difficult to say without seeing the detail of what will be covered under each area. The broad themes seem sensible but consideration of the value of food in a social context should not be overlooked. It is possible with the setting of goals and targets that this area is forgotten. Food is a great leveller and brings people together it plays a role in reducing loneliness and isolation, getting people together and indeed has a cultural function as well.

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?

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Some thought needs to be put in to how these will be reported on and hence what the resource implications may be for different organisations. For example, an organisation (outside of the public bodies listed (e.g. for funding purposes) may already be required to report on the wellbeing of future generations act and may also be asked to report on this.

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.

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We think that the setting of targets is a good way to measure progress against the food goals. Care must be taken in setting the targets and due regard should be given to both quantitative and qualitative measures. In addition to this given that the Bill also requires the production of a National Food Strategy could/should the targets and strategy be connected.

Question 8: Do you agree with the process for setting the targets?

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Care must be taken in setting the targets and due regard should be given to both quantitative and qualitative measures. In addition to this given that the Bill also requires the production of a National Food Strategy could/should the targets and strategy be connected. The process of seeking advice from the Welsh Food Commission and other independent parties with relevant expertise seems fine. However, it needs to be ensured that all relevant voices are heard and taken account of and this doesn't suggest how that will happen.

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

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This sounds reasonable. However, caution needs to be taken to ensure that a huge burden is not placed on organisation outside the scope of the legislation. For example charities funded through local authorities or Welsh Government may be required to report and may already have large reporting requirements.

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

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## Wales Food Commission

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

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A Welsh Food Commission that ensures that the goals and targets are met seems sensible. However, the Good Food Nation (Scotland) Bill does not appear to make reference to a Commission and so we would question whether there is a need for one in Wales, although an advisory group would still be beneficial in some form.

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

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See above

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

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They number of members of the Commission seems fine. The document makes reference to appointment by Welsh Ministers. Without further detail on this it is impossible to say whether this process is right or fair, there is a need to ensure that all voices are heard/represented including the community/third sector.

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?

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This seems appropriate to ensure that the Welsh Food Commission remains objective, however some goals and targets may be set that are longer than 5 years and thought needs to be given to continuity.

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?

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Whilst we can understand the potential need for appointing and paying staff we would suggest that careful consideration needs to be given to this area. The Commission should not become too big or costly to run as this would pull finance away from where it is needed in meeting the targets and goals.

## National Food Strategy

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

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Yes

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

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No, the current strategies relating to food are not sufficiently joined up. Different departments have developed separate strategies based on their areas of expertise and this has meant that some things are completely missed as they don't appear to fit anywhere in particular and also that the nuances and connections between the different parts can also be missed as a result.

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 no, what additional mechanisms would you put in place?

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The consultation on setting the targets and making a national food strategy differ. Again, care should be taken to ensure that there are a broad range of consultees and that all voices are heard, including those of the smaller less vocal parts of the food system.

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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?

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Again the requirements for reporting on the targets and the reporting on the national food strategy are subtly different. It would seem essential that reporting not only includes progress made but also considers what hasn't been achieved and why and what can be done to address that, as well as any new actions that may be needed.

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?

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The provisions for review seem to be in line with the review periods of other strategies. It is understood that some actions will take time to be implemented and make a difference. However, perhaps there needs to be provision for reviewing more frequently if necessary or deemed appropriate. Few people could have predicted the events of the last few years, and yet the impact on the food system has been dramatic at times, and so the ability to bring forward a review may prove beneficial.

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?

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There is a need to consider the resource implications and funding requirements of organisations that will be impacted by actions/ targets set out in the national plan.

## Local Food Plans

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

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Yes. Where we have seen local food partnerships develop these have been successful in driving forward local food action.

Question 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?

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The draft bill only suggests that the public body may consult with, rather than must consult with. Again, care needs to be taken to ensure that all voices are heard including those who are less vocal or have less time to e.g. attend meetings.

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?

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As with the national food plan it would seem essential that reporting not only includes progress made but also considers what hasn't been achieved and why and what can be done to address that, as well as any new actions that may be needed.

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?

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As with the national food plan.

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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?

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There is a need to ensure there is adequate support/ funding for local food partnerships to work across sectors to meet their new duties under the bill. There is also a need to consider the resource implications and funding requirements needed to implement the actions set.

## General Provisions

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

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

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

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## General Views

Please provide any additional information relevant to the draft Bill.

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