

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](#)

OSFB009

Ymateb gan: | Response from: Ffermydd a Gerddi Cymdeithasol | Social Farms and Gardens

Overarching principles

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

Yes

There is a lack of joined up thinking around food and food policy in Wales at present. There are competing strategies, policies and legislation causing confusion and concern. Food is a bit part of everyone's lives and we need to make sure it is recognised as that. The Bill aims to bring a focus and purpose to how food is managed, supported across the whole food system and that will lead to benefits to people and our environment going forward. It places a firm duty on public bodies to change their ways of thinking around food, and to work in partnership to help create a more economic, environmentally sound, fit for people food system.

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

Yes

We could spend almost limitless time here laying out the evidence that piles up on a daily basis of the need for wholesale transformative change in the way we feed ourselves. Our food system globally is responsible for around 30% of greenhouse gas emissions and food production is the single biggest factor in the tragic decline in biodiversity, we face alarming increases in diet-related disease and health inequalities - almost 60% of adults in Wales are living with overweight or obesity (Public Health Wales) and the full social cost of obesity to Wales is around £3 billion a year (Frontier Economics). A fragile global food supply system is manifesting its vulnerability to disruption on multiple fronts and is now spectacularly failing in that most basic of requirements, the very ability to feed ourselves affordably.

In the absence of a consensus on a collective vision for our food system in Wales, policy continues to emerge from silos where food sits in the backseat of other policy areas when it demands to be put in the driving seat. The consequences of this however could not be more serious. What seems like a good idea in one policy area can have dire outcomes in another and it is this failure that has arguably been responsible for endowing us with a modern food system that has become highly reliant on intensity and the concentration of production, with geographical specialisation increasingly being the norm. In general, we source food from where it is (superficially) cheapest, but the impact of that system has been to generate enormous costs elsewhere for the environment, health and in the economic wellbeing of our communities.

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.

SF&G support the idea of 'Food Goals', the idea aligns well with other legislation. However, in the draft text we feel the primary goal is perhaps a little weak in its definition, giving it would be the primary focus of the legislation. We urge the team to put more definition in at this higher level to avoid ambiguity – i.e. we couldn't support more food production at the degradation of our environment and well being. The overall aim could and should be to join things up across the whole food system – with climate change at the forefront of thinking perhaps the primary goal can reflect this more?

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

Yes, in principle we support the idea of a Primary Food Goal which is supported by the delivery of Secondary Food Goals – but see comments below for how we think these could be better aligned to needs, and could reduce the risk of action being siloed.

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

We support the approach being taken by FPAC on this question and copy their response here for clarity:

'The secondary food goals outlined in the consultation are sectoral and work against the need to take an integrated approach to the food system. FPAC have suggested alternative Food Goals, targets for which should be set by the Commission.

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.

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.

Net zero food system: A net zero food system for Wales (from plot to plate, and post consumption).

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.

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.

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.

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 will be overseen and mediated by the Food Commission, whereas each Minister will have a duty to collaborate to work to reach targets.'

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?

We do think the meat on the bones of the secondary goals should be the remit of the Food Commission – using the expertise that is available to them from all sectors.

It is vital that the food goals are a coordinating framework, which foster a responsibility to work in collaboration helping to ensure that finite resources are used most effectively in targeted ways.

There are existing reporting mechanisms that could be adapted and enhanced to cover some of the reporting requirements – i.e section 106 & Biodiversity reports, or wellbeing assessments.

Perhaps through the legislation it could support a paid for dedicated member of staff in each 'public body' to co-ordinate this whole system approach – much like the suggestions of paying for officers in the food commission – and similar to what currently happens for Local Places for Nature officers.

WG and the food commission should set the parameters of what reporting would be required to avoid duplication and each public body doing something different. This would help with some efficiency savings.

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.

We firmly believe targets should be clearly set out in this legislation. We are running out of time to act efficiently to protect what is left of our fragile eco-system. Setting high level targets and an absolute requirement to meet them is required. This is a once in a generation opportunity and if the legislation is too weak, we will achieve little from it. We know through the likes of the recycling targets set by WG a step change shift can be achieved. Clearly there would need to be support to work towards them and possibly even sanctions for those public bodies that do not perform well against the goals. We know the bill creation team are fearful of setting targets that can't be met so put that duty on the food commission. We offer here targets put forward from FPAC in their manifesto papers, which directly relate to the secondary goals listed above:

1. Food for all Target: Zero food banks in Wales by 2030
2. Food for public health 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 Target: Net zero emissions from Wales' food system by 2035.
4. Farming for nature and climate 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 Target: 30% of public procurement of food is from organic or agroecological Welsh producers by 2030

6. Sustainable food sector jobs and livelihoods Target: 100% of food sector jobs paid the real living wage by 2030

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

No. The process for setting the targets should be led by the Food Commission and Commission in coproduction with food system stakeholders. The commission should be tasked with recommending targets from the coproduction process to the Ministers for approval. The Commissioner should steer this process in order to ensure that the targets integrate work across government dept and Ministerial responsibilities. Otherwise, you end up in a situation of one Minister or another needing to steer the process and risk a sectoral approach to the process.

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

Yes - in principle. There just needs to be sufficient ability to provide feedback, and for things to be adjusted and tweaked should it be required. The mechanism for doing this should be, as you suggest, through the commission and through WG ministers.

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

No

Wales Food Commission

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

We see this as an absolutely critical element of the Bill. Like the draft text alludes to, this needs to be well resourced and efficient but it must allow external support to come in and help guide and shape their direction. It should be as independent as possible and should certainly not just be a re-hash of the current Food Division groups – which have too narrow a focus.

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

Like FPAC, we disagree with parts (c), (f) and (g) under section 10 and would propose that section 9 should include as an objective that the food commission should coproduce food goals with food system stakeholders. Part (c) should therefore align with the WBFG ways of working and expect the commission to collaborate with food system stakeholders "in relation to matters which significantly affect their capacity to make informed decisions about food matters;". Sections (f) and (g) should be about the commission making a set of recommendations for the Ministers to approve.

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

Seems about right at this stage but needs to have the ability to review numbers outside of the parameters currently mentioned, should the commission feel it's absolutely necessary.

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?

The re appointment of a chair/member only once will ensure new individuals with different experiences are appointed to shape the commission as it evolves. However, consideration needs to be given to how continuity is met in the first number of years – if everyone has to be re-appointed at the end of the 5 year period there could be a cliff edge of skills and understanding lost in fell swoop – or the danger that in year 6 there is no new blood coming through the commission. Perhaps a rolling 1/3 to step down every 3 years (after the initial period?)

We also have to ensure the commission is not a heavily handled top down approach that will just be resented by the public bodies.

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?

No not really, just that the commission members need to be well resourced and appointed through robust processes – but that is hard to detail in the legislation.

National Food Strategy

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

Yes absolutely, and especially one which brings together national and local government departments, health boards and farmers to focus on sustainable food systems. A National strategy would draw together all current and future strategies under one coherent approach and ensure engagement, and accountability, from all relevant bodies.

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

No, not at all. Food operates across all areas of life, as the Incredible Edible Movement would say 'if you eat you are in the club'. Yet in government "food" is siloed – perhaps in terms of agriculture, or food production. It is separately thought of in terms of health and hardly features in Net Zero plans! There is an opportunity to develop a closer working via local food partnerships. This would develop a coherent and strengthened approach to working on shared opportunities and challenges locally, as well as a Food Commission nationally to provide governance and oversight.

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?

The approach being talked about seems fair but any National Food Strategy should be developed in coproduction of key food system stakeholders but should be led by the commission, which then can advise the Ministers on the outcome of the process. The advice given and the final strategy should be a transparent process.

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?

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.

The bill does state that ministers must consult persons they consider to be independent and have the relevant expertise – could this go further with an independent reviewer being tasked with assisting in overseeing the final development of any such strategy as opposed to leaving it just to the ministers? Other relevant commissioners (e.g. future generations commissioner), must be consulted (as opposed to ‘may be consulted’).

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?

Yes

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?

No, the draft text aligns well with our thinking and direction of travel over the last few years.

Local Food Plans

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

Yes. We need to work out how they become a priority for the public bodies, and not just another piece of paper that they have to write because someone tells them they have to. It would be good in the first few years to bring in Public body representatives that may be involved in their drafting to come together through a ‘community of practice’ approach to help learning – something that has really worked well with things like the National Pollination Task Force – which is centrally supported by WG.

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?

There is a need for local food plans to ensure plans are relevant to the local area. The draft Bill does not yet set out enough detail to ensure the public bodies consult widely on their local food plan. Any such plan has to be shaped in partnership with key local stakeholders including local businesses, farmers, producers, and the communities it may have an impact on.

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.

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?

We would like to see it made explicit that local food plans can be developed and delivered via local food partnerships.

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?

We would like to see it made explicit that local food plans can be developed and delivered via local food partnerships.

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?

No

General Provisions

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

Yes broadly. We know the responsibility has to rest somewhere and the list is probably the most ideal place for now. However, we need to make sure that they are not created completely internally by these public bodies and some LA's will require support to achieve this.

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

No

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

No not really, if the Bill is successful in gaining support from the Senedd we will want action to happen as soon as possible and to us the proposed commencement date seems fair. What will be more important is how long the processes will take to get it into legislation etc.

General Views

Please provide any additional information relevant to the draft Bill.

Preamble

Dear Food (Wales) Bill drafting team.

Firstly, can we congratulate you on pulling together a simple to follow, concise draft Food (Wales) Act. We recognize the time constraints you have had to work with and the limited resources available to you to get it to this point.

We also thank you for the detailed pre consultation work that was carried out by your team. Through that process many of our concerns, ideas and thoughts have already been addressed in the content. Below we offer a general synopsis of how we interpret the draft legislation and then move on to answer the questions you pose more specifically.

Our response I'm sure will be similar in nature to many that you may receive from organisations and institutions that we are closely aligned, and partner with. I hope you receive feedback from a range of others including food processors, farmers and public bodies so your team can fully gauge the implications.

In general, we are very supportive of the draft text, it covers much of what we would hope such a Bill would do. We know you have looked across the borders at Scotland and England and it's good to see

the positive elements of their legislation coming through. I / we particularly like the intention to set up an overarching food commission for Wales – this, if well managed and resourced, should help to make vast improvements from our current position.

The consultation document references the Social Values and Procurement Bill,

The Agriculture Bill and the Community Food Strategy. However, it has omitted reference to how it would interface with the Environment (Wales) Act, the Public Health (Wales) Act and to provide sufficient detail on the relationship between the Food Bill and the Wellbeing of Future Generations Act.

This response is written on behalf of Social Farms & Gardens.

Social Farms & Gardens exists to support and develop community-based food & fibre production in all forms including, but not limited to, Community Gardens, Allotments, Community / City Farms, Community Woodlands, Care Farms and Community Supported Agriculture (CSA) projects. We represent around 2,500 member organisations across the UK, 390 of which are in Wales. We aim to better support and represent the farmers, gardeners and growers who run life-changing projects in our urban and rural communities.

We were established in 1980 under the name of the 'Federation of City Farms and Community Gardens' We have offices in Cardiff, Newtown, Bangor, Bristol, London, Scotland and Northern Ireland. Our movement has grown from a handful of projects at that time to the robust, diverse and dynamic sector it is today.

In the UK there are some 5000 community gardens, 200 city and school farms, 100 CSA projects. Between them they employ 550 people, engage with thousands of volunteers and attract over three million visitors each. In Wales, the only UK country to have a specific community growing strategy, there are about 450 community gardens & school gardens, 2 city farms, 6 care farms and 12 CSA projects. Social Farms & Gardens manages a number of WG and EU funded projects and we host the Community Land Advisory Service (CLAS) in Wales.

Many thanks for the opportunity to respond to this important consultation.