

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](#)

OSFB011

Ymateb gan: | Response from: Bwyd Sir Gâr Food

Overarching principles

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

Yes

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

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.

It is beneficial to include 'food goals' to underpin policy objectives as this provides a clarity on what is trying to be achieved. The language is also consistent with the WFGA 2015 which uses the term 'wellbeing' goals. The Food Goals enable food to be approached from a systems point of view (e.g. how environment influences health, how planning influences access to healthy food etc.),

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

We would like to see further clarification on how primary and secondary food goals would be structured in relation to each other, and the objectives that are defined under secondary goals.

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

We agree that all these food goals should be included, but the detail is explicit to enable coherence and communication between legislation relating to food at all stages of production, processing, distribution and consumption. And, that this ensures desired outcomes relating to tangible and measurable health and wellbeing, environment and climate and local economic improvements. It is vital that the links are seen between areas, and a system approach is taken that ensures that:

In addition, support for locally produced and processed food within Wales for contributing to food security, resilience to the disruptions of longer-supply chains, and supporting the local economy.

'Globally responsible' food production that works to limit the environmental and human cost of food imported from elsewhere in the World.

That food is considered at every stage, from fork to plate, in national and local net zero emissions targets.

That agro-ecologically food production is supported to enhance nature recovery.

That public procurement is seen as a key driver for supporting local and nature friendly farming practice, creating secure markets for local and small-scale producers.

That the public plate reflects public health nutrition standards protecting and enhancing health and wellbeing.

That there is equitable access to affordable healthy and fresh food for all.

That training and education is available to ensure a re-localisation of diverse food production

That livelihoods within food production and processing are sustainable and rewarding.

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?

It is vital that the food goals are a coordinating framework, which creates a responsibility to work in collaboration, and will ensure that finite resources are used most effectively in targeted ways. This can support the development of more effective coordinated action, rather than local public bodies working in isolation. Local food partnerships are a suitable forum for this way of working.

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.

The use of targets appears to be a useful way to clearly define and focus what is expected, how it will be measured and when.

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

Having these targets as regulations appears to create the accountability required as WG will have to report on the targets achieved/not achieved.

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

Having a Welsh Food Commission will be a beneficial way to maintain focus, scrutinise and hold accountable those expected to deliver.

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

Consultation with a wide range of sector stakeholders from the public, private, voluntary and business sector will be needed to ensure that targets reflect the national picture accurately. This should include voices from emerging sectors such as Welsh productive horticulture, small-scale food enterprises, and the voluntary sector, including community food providers (such as foodbanks and social supermarkets), and community food growing projects.

These targets will need to be broad enough in their definition to factor in flexibility to consider regional local distinctiveness in terms of population demographics and poverty statistics as well as land use.

Wales Food Commission

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

The creation of a commission would reflect the centrality of food in shaping the environment in which we live, as well as human health, wellbeing and security. Therefore, we see its creation as critical to supporting a good food movement for Wales in the 21st century.

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

That meeting climate and nature recovery targets are integral to the development of any national target setting relating to food systems.

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

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.

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?

National Food Strategy

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

We believe there is an urgent need for a national food strategy which brings together national and local government departments 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?

Currently, within different statutory and public bodies, strategies are developed in isolation from each other. They could be informing each other more closely. With increasing understanding that food plays a key role in health, wellbeing, community, the environment, climate, local economy as well as food security and resilience, there is an opportunity to develop an imperative for closer working via local food partnerships. This would develop 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?

That Ministers look at evidence of the effective actions that local food partnerships can put in place with strong engagement from Public Services' Boards. Strategic local food partnerships, developed to deliver the Sustainable Food Places framework, have a unique insight of what is taking place within their areas.

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 developing the food strategy as opposed to the ministers. If this is not possible 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?

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?

Local Food Plans

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

Yes. This would facilitate coordinated action over time improving outcomes on a range of indicators.

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. The local food plan should be led by a neutral partner with the plan being shaped in partnerships with key local stakeholders including local businesses and the communities it will 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 partnership. For instance, in Carmarthenshire the strategic direction of our food partnership, Bwyd Sir Gâr Food, is shaped by wide consultation with grassroots members of Carmarthenshire Food Network, representing a diverse range of private and voluntary sector actors across the county's food system.

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?

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?

Local food partnerships, developed through the Sustainable Food Places framework, are key to the development and delivery of strategies that work in a cross-sector/multi-disciplinary way at a local level. For instance, in Carmarthenshire we are working to foster partnerships to promote locally produced fruit and vegetables in public procurement, as well as embedding Nutrition Skills for Life across the voluntary sector.

General Provisions

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

In addition to local authority, local health board, and government ministers, we believe that to ensure food system interventions achieve the primary and secondary goals, there needs to be representation from agencies concerned with the preservation and enhancement of our natural resources, as well as representation from the voluntary sector.

We agree with the persons defined as public bodies however it would be useful to include a further breakdown of who should be involved (e.g. within a local authority it might include education, leisure, planning, economic development and so on) This would help to ensure joined up approaches within public bodies, as well as between them and ensure representation and engagement from all key partners.

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?

The proposed commencement date is timely.

General Views

Please provide any additional information relevant to the draft Bill.
