

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](#)

OSFB013

Ymateb gan: | Response from: Food and Drink Federation Cymru

Overarching principles

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

Yes

FDF Cymru agrees with the Bill's overall ambition for a safe and secure food and drink supply chain in Wales. To achieve this, it is fundamental that the food and drink supply chain is resilient to the challenges it faces currently, such as the impacts of the Ukraine crisis, and to future challenges. Therefore, we believe that resilience of the supply chain should also be considered as one of the overarching principles that the Bill seeks to ensure.

The Food (Wales) Bill should also give due consideration to similar work in other nations in the UK, notably the Good Food Nation Bill in Scotland and the National Food Strategy in England. Where possible and appropriate, these should complement one another to address the UK Food Supply Chain as a whole.

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

No

We would urge caution to legislating. While we very much welcome the focus on the future of food and its supply chain, there must be flexibility in how we address challenges that will face it in the future. We do not agree that this necessarily needs to be embedded in legislation but rather that industry continues to work closely with the Welsh Government to deliver the overarching objectives in Bill, similar to those in the Vision for Food and Drink.

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.

While we support the Bill's overall ambitions, we are cautious to provide views on the Food Goals as it is unclear to what level these would be set or how they would be achieved.

The food and drink industry is committed to working with the Welsh Government on delivering their Vision for Food and Drink, where there are many similarities to the overall aims of this Bill. We believe time should be given to see how this work developed before pressing ahead with legislation.

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

While we support the Bill's overall ambitions, we are cautious to provide views on the Primary Food Goal and Secondary Food Goals as it is unclear in the Bill exactly what is meant by "provision of affordable, healthy, and economically and environmentally sustainable food". It is also unclear to what level these would be set or how they would be achieved. We would welcome further clarification on the Primary Food Goal and Secondary Food Goal before moving ahead with this legislation.

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

The Secondary Food Goals should also consider how the Welsh food and drink manufacturing sector can be supported to stay competitive. Without a competitive supply chain on price, safety, quality, and product proposition, the sector will ultimately be unable to grow and thrive in Wales.

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 would welcome further consultation on the exact parameters of the Food Goals.

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 do not agree that targets need to be included to work towards affordable, healthy and economically and environmentally sustainable food for people in Wales. The food and drink industry is committed to working with the Welsh Government on delivering their Vision for Food and Drink, where there are many similarities to the overall aims of this Bill. We believe time should be given to see how this work developed before pressing ahead with legislation. If targets are to be included, they must be developed in consultation with industry to ensure that they are realistic and not tied to political or arbitrary ambitions.

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

If industry is required in legislation to reach targets, it is imperative that they are heavily involved in developing them with the Welsh Government.

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

Five years would be appropriate for targets set out in law. As stated above however, we believe the Welsh Government Vision for Food and Drink sets out targets that would complement the Bill's Primary Food Goal to deliver affordable, healthy, and economically and environmentally sustainable food. Therefore, these are ones that should be measured.

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

We would welcome further consultation on the exact parameters of the targets to be able to provide insight into resource implications.

Wales Food Commission

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

We believe that if Food Goals and targets are included within the Bill, there should be a Welsh Food Commission to be consulted upon to set these.

Consideration also must be given to how this body interacts with the existing Food and Drink Wales Industry Board and other similar bodies that represent other aspects within the overall food to fork supply chain in Wales.

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

Please see our response to the Questions on Food Goals

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

The size of the Welsh Food Commission seems appropriate – however, only if the membership consists of representatives in the food and drink supply chain in Wales, including food and drink manufacturing. Going beyond the breadth of the supply chain to include members from outside the food and drink industry would be at the detriment of the group.

Our FDF Scotland colleagues are founder members of the Scotland Food and Drink Partnership set up by Scottish Government in 2007. This blueprint for collaboration between governments, industry, sector trade associations and others to develop programs of impact is a model that we would suggest be considered the structure.

This group has a core professionally paid operating function as proposed within the Food Commission and operates with a broad range of industry, academic and delivery partners some of whom such as ourselves operate in Wales already.

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?

Given the scale of the challenges and the need for stability, we would agree.

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?

N/A

National Food Strategy

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

We are supportive of strategies that recognise the importance of food and drink to Wales. We welcomed the publication of the Welsh Government's Vision for Food and Drink last year. It is unclear at this time what another strategy would achieve as we imagine it would replicate much of the targets and themes in the Vision.

If another strategy were to be developed, there must be consideration to how it would interact not only with the Welsh Government's vision but also with the Good Food Nation Bill and the Government's National Food Strategy for England.

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

FDF Cymru has a close relationship with the Food Department in the Welsh Government. We would welcome further cross-department collaboration on strategies and policies where they relate to the food and drink supply chain.

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?

N/A

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?

The proposed reporting and governance processes as proposed are sufficient if a National Food Strategy were to be developed.

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?

We would welcome the revision of the strategy to be jointly with the Food Commission rather than by Ministers alone

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?

We would welcome further consultation on the exact parameters of the strategy to be able to provide insight into resource implications.

Local Food Plans

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

While we have general support for the overall ambitions of the Bill, it is unclear what a 'Local Food Plan' would consist of therefore we would need further clarification in order to provide views, particularly as they relate to Primary and Secondary Food Goals which do not set out what their targets would be or how they would be achieved.

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?

As part of the consultation process, public bodies should not only consult the Welsh Food Commission but also food and drink businesses within their local area and their representative organisations.

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?

If Local Food Plans were to be created, the reporting process set out in the Bill is sufficient.

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?

As Q35.

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?

We would welcome further consultation on the exact parameters of the strategy to be able to provide insight into resource implications.

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

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

General Views

Please provide any additional information relevant to the draft Bill.
