

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](#)

OSFB014

Ymateb gan: | Response from: Cyngor Abertawe | Swansea Council

Overarching principles

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

Yes

In terms of the need to strengthen food security, improve Wales' socioeconomic well-being, and enhance consumer choice, to mitigate against the effects of climate change, poverty and the global events (including the war in Ukraine). However, consideration should also be given to whether the passing of such a bill provides better assurances for primary producers.

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

Yes

The aim of the legislation is to enforce the seven well-being goals set out in the Well-Being of Future Generations (Wales) Act by placing specific duties on public bodies via new primary and secondary 'Food Goals'. It will ensure transparency and accountability towards meeting those goals, by means of oversight by a Welsh Food Commission, which is to be welcomed.

The UK Gov has published a strategy and Scottish government has passed legislation along similar lines and Wales should not be left behind the rest of the UK.

However, it is important that the new regulations do not create additional pressures for food businesses already struggling.

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.

They are clearly derived from the policy objectives and easy to understand.

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

Yes. Primary and secondary food goals are required, those stated seem to capture all.

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

Wales would benefit by returning to a home grown produce agenda which encourages seasonal eating, reducing emission through less food miles travelled and provides a stronger local economy and more opportunities. In order to do so Welsh Government needs to provide farmers with the right level of support to transition to more sustainable farming practices to ensure it is viable to increase production and supply larger local markets, if we are to encourage better food security. If we are to incorporate local produce into public procurement. local authority budgets will need to be increased to offer a fair price to producers.

There is an obvious need for a stronger commitment to food education and food skills development to ensure better healthier diets and well-being, to ensure less reliance of processed convenience foods. Better food skills will help families to manage food costs, provide better health and nutrition to aid the reduction of food poverty. The bill mentions about low date goods at supermarkets should be offered to food banks to reduce food waste this does not necessarily elevate food poverty or wellbeing issues around food poverty. Households on low incomes deserve dignity around food poverty issues and not be treated as mechanism for reducing waste by consuming food that is going out of date as their only choice. To address food poverty the bill should look incorporate fresh foods to low income households.

There is a cross-over between the secondary goals, eg in relation to the food waste goal, reduction could be by redistribution which could also affect the economic well-being goal. Similarly, the education goal has an impact on the health and social goal, so it would be useful to have targets that recognise this cross-over. There is an ability in the legislation to amend the description of the secondary food goals and to amend the targets following review.

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 won't know the impact of the Food Goals until regulations are published which set out the targets and the date for meeting those targets. This could be up to 2 years from the date of the relevant section of the Act coming into force.

Issues around access to and protection of land for food production needs to be addressed, if food security is to be achieved.

Concentration on public procurement to source at a local level is vital, however a fair price and contract level needs to be taken into consideration to ensure a sustainable level of supply. Quick fix solutions and unrealistic budget commitments will compromise the quality of produce, ability to supply, consumer interest and quality of diets.

The Sustainable Farming Scheme seems to struggle with climate verses food production, and which is the more important. Where both are important the urgency to address both at exactly the same time seems limiting and potentially could result in failings, which may see more family farms either needing substantial support, diversifying the land into non-food production, or just being sold off. However, if the bill does compliment the SFS and opens up more local markets at a fair and valued rate it could provide choice to end consumers linking into healthier options, all the better.

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.

It makes sense to include targets to measure progress provided the targets are objective, achievable and promotes the Primary Food Goal. This will need careful consideration and a cohesive approach with WG Ministers and consultation with various stakeholders to ensure achievable measures are set and tangible outcomes gained. Timescales mentioned seem a little short.

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

Targets are to be set in consultation with the Welsh Food Commission and 'independent' persons. Members of the WFC cannot be members of the Senedd, Welsh Government or Local Authorities. If there is no consultation with the public bodies in target setting, how will Welsh Ministers know whether they are realistic?

The process for setting targets requires streamlining. Point 33 is a little confusing and could be in danger of diluting the aims of the bill through layers of additional legislation and regulations, which could impact on timescales and delivery.

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

There is no reference to scrutiny by the public bodies who will be under a duty to meet the targets. Will public bodies eg Local Authorities be asked for relevant reasons if the targets are not met? Will the information laid before the Senedd also be published at a local level with information re: targets relevant to the local area?

The reporting mechanisms will depend on the targets set and the timescales, the process set in the draft may not be appropriate to the level of targets set or for each area relating to the food goals and subsequent regulations.

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 won't know the resource implications of the targets until they are published. However, there will be no review of the targets until year 5. It might be worth an earlier review eg after 12 months to consider the appropriateness of the targets and the resource implications of meeting them as they might not be met if there are insufficient resources.

Wales Food Commission

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

It will be necessary to have an adequately resourced body capable of setting targets and measuring achievement against those targets and reporting as appropriate to the Senedd.

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

We are pleased to see that the functions include the assistance of public bodies in setting food policies and providing them with advice and assistance generally as this legislation will lead to

resource implications for the public bodies themselves. The functions should refer to consultation with Welsh Ministers in relation to setting the targets as well as reviewing the targets.

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 membership seems about right. Too large and it might hinder decision making.

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?

See comment above about having a more frequent review of the targets. Otherwise the whole Commission may change at year 5 and you would have new members who weren't involved in setting the original targets which are due for review and so might not understand the rationale behind setting those targets or the full implications of changing them.

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

National Food Strategy

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

Agreed, but public bodies must 'have regard to it'. Their primary duty is to achieve the targets so the strategy must be coherently linked to those.

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

If the bill is able to provide a collaborative approach to develop food policy across WG departments, it would have the ability to relieve conflicting pressures on food producers and supply chains with positive results.

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?

We would recommend that public bodies are consulted to obtain political 'buy-in' and because the local food plans will have to relate to the strategy.

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?

Yes they are sufficient

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?

Possibly five years is too long before review. Maybe should have a shorter time period – as per comments above relating to targets.

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

Local Food Plans

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

The plans will be necessary to set out policies relating to the advancement of the primary food goal and the secondary food goals and the achievement of the food targets. However, if Local Authorities are being given a duty to produce local food plans they should be provided with the necessary resources to undertake this task.

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 no duty to consult with the general public in the relevant area, which would be welcomed as they will be affected by the plans and policies.

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?

Yes, they are 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?

See above re: review periods being too long (5 years)

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

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?

The Act won't really have an impact on public bodies until up to 2 years from commencement when Regulations are made to set the targets.

General Views

Please provide any additional information relevant to the draft Bill.
