

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](#)

OSFB019

Ymateb gan: | Response from: Ymddiriedolaethau Natur Cymru | Wildlife Trusts Wales

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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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Maybe

We would support the Bill if the proposed legislation would do more to ensure that the environment is both protected and restored through the production of sustainable food. At the moment we have serious concerns about the Bill in this area. Reducing harm to the environment as stated in the Bill is not sufficient given that it is now recognised that we are living through a Climate and Biodiversity Crisis, The proposed Food Bill needs to ensure, as a key overarching principle, that food production ensures the climate and nature crises are addressed. The Food Bill needs to be clear that the way to address these critical issues is through the promotion and adoption of agroecological practices. Over 85% of Wales is comprised of farmland. Wales is one of the most nature depleted countries in the world with 1 in 6 species threatened with extinction. Food production therefore has a vital role to play in stopping the ongoing decline of the natural world and putting it back into recovery across Wales. The proposed Food Bill needs to clearly state that a key purpose is to restore nature and protect the environment. At the moment it does not do this. We recognise that the proposed Food Bill presents a clear opportunity to ensure that a nature and climate friendly food system is developed for Wales. But at the moment we do not think that this Bill in its current form will realise this opportunity.

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

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Maybe

Wildlife Trusts Wales believes there is a need for this legislation provided it emphasises the importance of producing food in a sustainable environmentally friendly way which protects the natural world and enables it to recover across Wales where food is produced. It is vital that this Bill is fully aligned with the net zero targets for Wales to address the climate crisis. We recognise that the objectives of the proposed Bill complements those of the Sustainable Farming Scheme. It will be vital that this Bill help supports the development of agroecological food supply chains. A key justification for this Bill will be if it enables the joining up of food policy from national to regional and local food plans where sustainably produced food is grown and then sold.

## 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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The Food Goals need to be significantly strengthened to ensure that food production in Wales does not contribute to nature's ongoing decline and is contributing to its recovery. The Food Goals also need to be absolutely clear about food production addressing and mitigating the climate crisis and not contributing to it.

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

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

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?

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.

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

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

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?

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

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?

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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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## National Food Strategy

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

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We agree on the need for a national food strategy to ensure a joined up approach across all Government departments that have a responsibility for the food system in Wales. This strategy needs to have agroecological principles at its core which will result in multiple benefits for both people and the environment.

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

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No at the moment food and food production are not sufficiently joined up. There is a clear mismatch between the ongoing industrialisation of the food sector and the proposed objectives of the Sustainable Farming Scheme. The pollution of and associated ecological destruction of Welsh rivers, which has received widespread publicity, through the ongoing development and deployment of intensive poultry units in mid Wales is an obvious and clear example of a complete lack of a joined up approach on food production by the Welsh Government.

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?

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?

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?

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## Local Food Plans

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

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?

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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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?

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### 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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