



Size of Wales written response to the Economy, Trade and Rural Affairs Committee regarding the Food (Wales) Bill

Overview

Size of Wales welcome the current draft which responds to several of the issues and concerns we have previously raised. However, we believe the Bill could be strengthened in a number of areas. Our key points include that the overarching principles of the Bill must also consider Wales' global responsibility. In other words, it is essential that the impact of Wales' food system beyond Wales is considered and that future food legislation and policy serves to eliminate unsustainable practices here and overseas. Furthermore, to ensure the changes to Welsh land management via the Agriculture Bill and Sustainable Farming Scheme are fully realised, the Bill must proscribe consideration of principles such as sustainable management of natural resources, sustainable land management, and the delivery of Net Zero within the text of the legislation.

1. Introduction

- 1.1. We believe there is a need for legislation to ensure a coherent, consistent, and strategic cross-governmental approach to policy and practice on all aspects of the food system. We need systematic change to ensure our food system is fit for future generations, as outlined in our 'Food System fit for Future Generations report'¹.
- 1.2. Our food system is negatively impacting the environment, health and economic wellbeing of Wales. In 2022, one in six people in Wales were found to be skipping meals,² and in 2019, over 60% of the population were overweight or obese.³ Alongside this, farmers bear most of the risk associated with providing food for the population but receive the smallest proportion of profit from the final product.³ Wales is now one of the most nature depleted countries in the world with 1 in 6 species threatened with extinction. We know from highly respected scientific evidence bases like the State of Nature Report that current methods of unsustainable land management, which largely include agricultural production, are the largest drivers of nature's decline. Agriculture contributes 15% of Welsh greenhouse gas emissions, much of it methane from livestock, and agricultural emissions have been rising in Wales over the last decade. This figure is higher when considering the wider food supply chain, including imported animal feeds⁴.

¹ Food System fit for Future Generations report <https://www.wwf.org.uk/updates/welsh-food-system-fit-future-generations>

² Wales TUC Cymru, '1 in 6 skipping meals and going without food in Wales – Wales TUC mega poll reveals' (18 Oct 2022).

³ Health Minister, 'Health Minister launches ambitious new plan to halt obesity rise in Wales' (Welsh Government, 17 October 2019).

⁴ https://www.wwf.org.uk/sites/default/files/2021-11/wwf_risky_b_wales.pdf

- 1.3. At present food policy operates in silos, resulting in contradictory policy aims. For example, WWF Cymru report 'A Welsh Food System Fit for Future Generations' found a lack of connectivity between the 'vision' of growth for the Welsh food and drink sector and sustainability objectives such as Net Zero targets.
- 1.4. We believe embedding agroecological principles within the Bill would be the best way forward to ensure a holistic food system that develops a farm-to-fork shift, as those principles cover environmental, economic, social and cultural considerations, and will ensure true resilience within our food system. Overall, our view remains – if designed recognising the foundational nature of the environment to the economy and society, the Bill presents an opportunity to create a meaningful framework in which to develop the policies, strategies, and actions we need to deliver a sustainable food system fit for future generations. An embedded analysis provided by the Stockholm Resilience Centre⁵ concludes that everything is ultimately dependent on a healthy environment. Without it our society, economy and culture are not resilient. The Stockholm Resilience Centre conclude that all the sustainable development goals are directly or indirectly connected to sustainable and healthy food. They conclude that economies and societies should be seen as embedded parts of the biosphere, and a vision is needed to move away from the current sectorial approach where social, economic, and ecological development are seen as separate parts.

2. The Need for Primary Legislation

Primary legislation can be the most effective tool for developing a joined-up system of effective governance and accountability. The Bill is an opportunity to ensure legislation and policy is developed strategically and consistently to ensure every person has access, in a dignified and culturally appropriate manner, to sustainable, nutritious, and healthy food at all times.

3. Food Goals and Targets

- 3.1. We feel the primary goal is 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. We would like the primary goal to be explicit on the need to restore nature and mitigate and tackle climate change in Wales and overseas. The ⁶Wales Food Bill's primary aim should be to provide a legislative framework that enables policy coherence across the food system guided by agroecological principles.
- 3.2. Our response to the previous consultation recommends alternative secondary food goals that were developed by the Food Policy Alliance Cymru. Their proposed secondary food goals are: Food for all, Food for public health, Net zero food system, Farming for nature and climate, Sustainable food procurement, Sustainable food sector jobs and livelihoods.

⁵ [Planetary Boundaries - an update - Stockholm Resilience Centre](#)

⁶ https://www.foodsensewales.org.uk/app/uploads/2021/10/FPAC_English2021.pdf

- 3.3. Reflecting on the current secondary goals set out in the draft bill, we particularly welcome the inclusion of environmental goals, given that the draft food bill that was released in the summer of 2022 was particularly weak on environmental principles.
- 3.4. We particularly welcome the secondary goal that minimises Wales' global environmental footprint. This could be strengthened further, in line with our recommendation for a 75% reduction in environmental footprint of food production and consumption at home and overseas by 2035. It is essential that the impact of Wales' food system beyond Wales is considered and that future food legislation and policy serves to eliminate unsustainable practises here and overseas. Wales and Global Responsibility⁷, a report by WWF Cymru, RSPB Cymru and Size of Wales found that: *An area nearly half the size of Wales was required overseas to grow Welsh imports of cocoa, palm, beef, leather, natural rubber, soy, timber, pulp and paper in an average year between 2011- 2018, causing deforestation, habitat conversion, greenhouse gas (GHG) emissions, and risking exploitative labour practices and human rights abuses such as abuse of Indigenous Peoples rights. See Annex 1 for further information.*
- 3.5. Considering the above commodities, it is clear that Wales' food sector has a large overseas deforestation and habitat loss footprint.
- 3.6. Where the Bill states it will 'lessen environmental impacts of food production, processing and consumption', we feel this is not strong enough to ensure substantive enough changes will occur.
- 3.7. **The Bill should establish a specific requirement within the Environment secondary food goal for both biodiversity and climate change targets as these are statutory environment priorities, rather than setting one target that covers all aspects of the Environment food goal**
- 3.8. Economic wellbeing: Promotion of locally produced food does not go far enough – infrastructure as well as support for food hubs, Community Supported Agriculture and public procurement is essential to improve the reach of local produce. Furthermore, not all local food is environmentally sustainable. Environmental standards should be attached to local produce during procurement. For example, in Scotland, more than half of local authorities are now affiliated with Soil Association Scotland's Food for Life Scotland (FFLS) programme. Holders of the FFLSH gold award spend at least 15% of their ingredients budget on organic produce. In Copenhagen, almost 90% of the food sourced for municipal meals is organic
- 3.9. There is a need to ensure that the secondary food goals are taken together and delivered in an integrated and balanced way to avoid selective prioritisation of individual secondary goals

4. Welsh Food Commission

- 4.1. The set-up of a Wales Food Commission was one of the key recommendations in WWF Cymru Food System Fit for Future Generations report. A Commission must be well resourced and efficient, but **it must allow external support to come in and help guide and shape direction. It should be independent of the Welsh**

⁷ [wwf_risky_b_wales.pdf](https://www.wwf.org.uk/what-we-do/our-campaigns/food-systems/wwf-risky-b-wales)

Government.

- 4.2. The proposed Food Commission should outline a set of principles to ensure that it will align to the principles and goals of the Well-Being of Future Generations (Wales) Act 2015, the sustainable management of natural resources, and the Equality Act 2010 and Welsh Government Equality Action Plans.
- 4.3. It is important the Commission consults the Future Generations Commissioner and the Auditor General. The Bill should replace 'may consult' with 'must consult'.
- 4.4. In the delivery of its functions the Commission should be required to deliver via co-production with a range of stakeholders, prioritising collaboration with local Welsh civic society, third sector, members of the public, and relevant bodies to ensure their work is impactful. Membership of the Food Commission includes expertise from all food goal areas, and ensure a diverse range of voices are represented. This means engaging with the wider public in the process, for example through citizen assemblies, and ensuring that the resulting vision reflects the identified priorities and builds upon their lived experiences
- 4.5. The Food Commission's role should be to navigate the process of integration of food-related policies across Ministers' portfolios and Welsh Government departments.

5. National Food Strategy

- 5.1. Size of Wales welcomes the draft Bills intentions to enable a pan-Wales approach to the food system via the development of a National Food Strategy (NFS). This strategy should be guided by agroecological principles in order to enable the development of a more coherent and effective national food strategy that delivers environmentally, economically, socially and culturally here in Wales whilst taking into account our impact overseas.
- 5.2. The Welsh Food Commission would be best placed for carrying out the process of developing the NFS via a process of co-production. In light of the five ways of working of the Well-Being of Future Generations Act, including involvement, integration and collaboration, there is a legal mandate to engage with as wide a range of actors within the food system as possible to build the National Food Strategy. Co-production should ensure strategy is aligned with the needs of communities, in particular communities with high levels of deprivation and inequality who lack access to affordable, healthy food.

6. Local Food Plans

- 6.1. Public bodies have been found to have very different and inconsistent attitudes towards food policy within their own remit. A vision and plan for Wales' food system, as set out in the National Food Strategy, should guide the development of local food plans.
- 6.2. We would like to see it made explicit that local food plans can be developed and delivered via local food partnerships.
- 6.3. Public bodies 'must' rather than 'may' consult with the Welsh Food Commission and Future Generations Commissioner when making their local food plans. There

should be a duty (rather than have regard for) placed on public bodies to incorporate the National Food Strategy priorities into their decision making.

- 6.4. The procurement strategies of all public bodies covered by the Social Partnership and Public Sector Procurement Bill are informed by the National Food Strategy and local food plans as established by the Food Bill.
- 6.5. Developing more direct routes to market would offer a rebalancing of power and reduce inefficiencies related to long supply chains. However, the increase in capacity of local food is unlikely to be achieved without support from Welsh Government and a strategy to fund and develop local food infrastructure such as small abattoirs, food processing facilities and food hubs.
- 6.6. Local food plans should prioritise local food from sustainable sources – e.g. from farming systems such as agroecology, organic farming, and agroforestry.⁸
- 6.7. At present, the local food plans ‘may’ look at provision for those at risk of food poverty and malnutrition. Ensuring local food is accessible to everyone should be a key aim of the local food plans and therefore we argue local food plans ‘must’ look at provision for at risk communities and individuals.

7. General Matters including Meaning of Terms, Regulations, Interpretation, and Commencement

- 7.1. Size of Wales hold some concerns around the definition of ‘local food’ in the Bill – **local food is not always the most sustainable food** especially where they depend on significant imported inputs such as soy or palm contained in animal feed. The Welsh Food Commission should have the ability to define ‘local food’ in an environmentally sustainable manner. Any definition of local food should relate to food grown in a specified area or region, rather than sourced from a local supplier who may source their food from a non-local area, and should consider the methods of production such as organic standards, Food for Life Served Here awards, Pasture for Life and Fairtrade, for example, to ensure sustainable farming methods are being prioritised and integrated into strategy.
- 7.2. There is a lack of substantive detail to align the Bill with other policies such as the Agriculture Bill and Sustainable Farming Scheme, the sustainable management of natural resources within the Environment Wales Act, the commitment to roll out the Eatwell diet in Wales as set out in the most recent Wales net zero plan and other legislation relating to health and the environment.

8. Potential Barriers to the Implementation of the Bill’s Provisions

- 8.1. Size of Wales advocate for the role of co-production in the development in the national and local food plans. We believe a large cross-section of stakeholders must be engaged from the start to ensure the development of plans which meet the need for sustainable, nutritious, healthy, and affordable food at all times.

9. Unintended Consequences Arising from the Bill

⁸ WWF, ‘[Farming with Biodiversity. Towards nature-positive production at scale.](#)’ (WWF International, Gland, Switzerland: 2021).

9.1. The integrated delivery of secondary foods goals is essential in avoiding cherry-picking goals and objectives and unintended consequences.

9.2. This bill must align with and complement existing/upcoming legislation and policy in Wales. For example, we want to see the Agriculture (Wales) Bill include a definition of Sustainable Land Management, and accordingly the Food Bill should place a requirement on Welsh Ministers and public bodies to ensure that the National Food Strategy and local food plans should aim to support the uptake of 'Sustainable Land Management'.

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Annex 1

Wales' food sector has a large deforestation footprint. For example,

- Wales' imports 190,000 tonnes of soy a year. Soy is mostly imported into Wales in the form of meal and beans for livestock feed. The Welsh poultry industry is estimated to be responsible for consuming 48% of Wales' imported soy feed for livestock, followed by dairy (20%) and sheep (19%). Nearly three-quarters of the soy import land footprint falls in countries that are high or very high risk for deforestation and/or social issues, including Paraguay, Brazil, and Argentina. Greenhouse gas emissions from land use change, such as deforestation, for growing Welsh imports of soy total over 1.1 million tonnes of CO₂e each year.
- Palm is mostly imported into Wales in the form of palm kernel expeller and oilcake (53% of total), which is an ingredient in livestock feed. A further 27% of imports are palm oil, which is used in many processed foods, such as biscuits, cakes and confectionary, and personal hygiene products (e.g., soap). Welsh palm imports total 51,000 tonnes a year 37% of the palm Wales imports is grown in Indonesia, where land use change associated with its production totals 168,500 tonnes of CO₂e each year. 85% of the palm import land footprint falls in countries that are high or very high risk for deforestation and/or social issues, including Indonesia, Malaysia, and Papua New Guinea. This makes palm the highest risk commodity that Wales imports.
- Most beef imported into Wales is fresh or chilled (53%). The rest is frozen or in processed meat products such as corned beef. Welsh imports total 12,000 tonnes of beef equivalent each year. Welsh beef imports require a land area the size of the Brecon Beacons every year. 26% of the beef import land footprint falls in countries that are high risk for deforestation and/or social issues, including Brazil and Australia. Welsh imports of beef account for 5% of the UK's total beef imports, which is comparatively high considering Welsh share of UK GDP and



population. Wales has a higher proportion of its beef land footprint in Brazil compared to the rest of the UK (15% of total versus 12%). This is due to higher levels of corned beef consumption in Wales, which nearly always comes from Brazil.

- Welsh annual imports of cacao total 15,000 tonnes. Greenhouse gas emissions from land use change associated with the production of cacao for Welsh imports total 68,800 tonnes CO₂e each year. Wales imports the majority of its cacao from West African countries, where there are risks of deforestation and social issues, such as child labour. Welsh consumption of cacao products is slightly higher per capita than the rest of the UK.