

Senedd Cymru

Pwyllgor yr Economi, Masnach a Materion Gwledig
Bil Bwyd (Cymru)
FWB-24

Ymateb gan: David Smith

Welsh Parliament

Economy, Trade, and Rural Affairs Committee
Food (Wales) Bill

Evidence from: David Smith

Food Bill consultation – September 2022 - Response by David Smith, MA, PGCE (FE)

Additional comments and updating are coloured text, 27 January 2023.

Note: some questions from the original consultation could not be retrieved and included with the answers provided.

Q11

I am lukewarm about the Bill. It is very much a mixed bag and crucially uncosted. Further, I have difficulty in squaring it's interventionist nature (ref. public sector capacity and cost implications), in the context of the centralising thrust of UK Internal Market/ free market legislation and the continuing serious reduction in public funds available from the UK Treasury. I seriously doubt Welsh Government has the capacity to effectively undertake even some of the actions proposed in this Bill. Both Welsh Government and local authorities needs to sharply focus upon deliverable public health priorities.

Priorities: Recent events significantly impact upon the cost of living of most people and will continue to do so over the next decade *and more. We need to directly focus upon those in greatest need. My particular concern is with the growing number of children who are, are in danger of becoming obese and undernourished. This is all very well evidenced with it impact on learning and life chances.*

Food quality for children is most important. We cannot legislate to solve every problem, but free school meals (FSM's) are a once in a lifetime opportunity that only Government can take to address long term intergenerational health inequalities. In other words, the future grandchildren of today's pupils. In this respect much more should be done by ministerial direction. This in turn should help drive some of the changes required in our food system and our beyond. For example, our new curriculum in terms of food preparation, cooking and money management.

This leads me to the conclude all levels of government should sharply focus upon public health, *especially, how we effectively deliver free, nutritious, acceptable school meals across our schools system to a large and growing number of pupils currently outside existing arrangements.*

If this proposal is to proceed, particular attention should be given to 'Social Partnership' issues, including employee training; the circumstances in which public funds are deployed across the food chain sector; and how consumers are given adequate voice. This should include improving pay and conditions to ensure well trained *catering* staff are in place to deliver this vital service.

These are aspects I championed within the Food Standards Agency from 2000-2006.

A. It may be pertinent to note:

- (a) the horror of FSA Wales colleagues when I wrote an article in the Western Mail arguing for the establishment of a Welsh Food Commission in early 2003.
- (b) my views have changed in the past few weeks due the emerging Cost of Living crisis (for the latest position see: <https://foodfoundation.org.uk/news/food-prices-tracker-january-2023>)
- (c) When Jane Hutt MS was the Health Minister c. 2004-2006 (or there abouts), some of what the Bill attempts to achieve can be found in the early role of UK FSA Wales. They provided the Secretariat bringing together a wide range of stakeholders in preparing a 'Wales Food and Nutrition Strategy'. (I was involved at the time as a WCVA representative). This was sadly lost when a new Health Minister decided to assert Welsh authority over devolved 'nutrition' matters without adequate capacity to make this a reality.
- (c) Over the past year the Independent Food Aid Network <https://www.foodaidnetwork.org.uk> have undertaken impressive work for a small organisation. I have actively supported their Cash First campaign as a focused approach to supporting hard pressed consumers. Despite encouragement, so far only three local authorities have adopted this approach – Swansea, RCT & N&PT. In other local authorities we see a variety of initiatives by different organisations in the same locality. Work should be consolidated, for example, into one print leaflet.



Worrying About Money?
Financial advice and support is available if you're struggling to make ends meet. Find out more at www.wandsworth.gov.uk

Step 1: What's the problem?
I suddenly have no money
Lost job/reduced hours
Lost money/unexpected expense
Disaster (e.g. flood or fire)
Relationship breakdown
Money stopped (e.g. failed a medical)
Benefit stopped - see option 5
Options: 1 2 5 6

Step 2: What are some options?
1 Council Discretionary Support Grants
Discretionary support grants include crisis assistance, discretionary housing payments and community care grants.
This will depend on your current circumstances and you can find out more at:
www.wandsworth.gov.uk/housing/benefits-and-support/

2 Maximise Your Income
Anyone who is struggling financially can get a benefit check and speak to an advisor for free and confidential advice.
A benefit check...

Step 3: Where can I get help?
Each of these services offer free and confidential advice
Citizens Advice Wandsworth
Advice on benefits, debt, housing and more
0800 278 7833 (freephone)
www.cawandsworth.org
Help with options: 1 2 3 4 5 6
Wandsworth Council
Find out which discretionary support grants you may be entitled to
www.wandsworth.gov.uk/housing/benefits-and-support/
Discretionary Support Grants
Help to apply for discretionary support grants
- run by Citizens Advice
0204 528 0100

Reducing the need for charitable food aid A cash first approach to food insecurity

Sabine Goodwin, INDEPENDENT FOOD AID NETWORK

INDEPENDENT FOOD AID NETWORK

12. Do you think there is a need for this legislation? Yes, Not necessarily. Some aims could be attained in a more direct way by government. However, see this is case study of “The Toronto food policy council: Twenty years of citizen leadership for a healthy, equitable, and sustainable food system. The TFPC was the first food policy council in Canada and celebrated its 20th anniversary in 2011. It operates as a subcommittee of the Toronto Board of Health and is supported by a Coordinator who is an employee of Toronto Public Health. Members of the TFPC include city councillors and citizen volunteers from diverse organizational and community backgrounds who embody a broad array of thinking about food and health. Members do not represent their organization or sector; they are charged with bringing their experience and strategic perspective to the City of Toronto”. See <https://cihr-irsc.gc.ca/e/47602.html>

With quality food policy advice, could Welsh Government with support from, for example, a 'Toronto Style Food Policy Council' <https://cihr-irsc.gc.ca/e/47602.html> achieve some of the Bill's proposed objectives through:

- 'requiring (specified) public (e.g., NHS) bodies to take reasonable steps to advance the food goals (Is this not already being done? Local authorities may be more problematic for contractual reasons and economies of scale involving English consortia?)
- act to 'promote and facilitate the advancement and achievement of the food goals by public bodies'
- 'prepare and publish a national food (and nutrition) strategy' and
- requiring 'public bodies to make and publish a local food plan'. This would be difficult in present circumstances for many local authorities.

Two comments:

- A. Interestingly, some of what the Bill attempts to achieve can be found in the active support of UK FSA Wales working with a wide range of stakeholders in preparing a very promising 'Food and Nutrition Strategy for Wales' <https://cihr-irsc.gc.ca/e/47602.html> when Jane Hutt MS was the Health Minister c. 2004-2006 (or thereabouts). I was involved at the time as a WCVA representative. (Dr. Liz Dowler was commissioned to evaluate this strategy and this should be available from UK FSA) This was sadly lost when a new Health Minister desired to assert Welsh authority over devolved 'nutrition' matters without adequate capacity to make this a reality.
- B. Undeniably, we need to recognise most of the heavy lifting requires action by the UK Government and the predominantly based English private food sector.

'Concluding observations on the sixth periodic report of the United Kingdom of Great Britain and Northern Ireland* CESRC 2016: Paragraph 53: "The Committee is concerned about the lack of adequate measures adopted by the State party to address the increasing levels of food insecurity, malnutrition, including obesity, and the lack of adequate measures to reduce the reliance on food banks. The Committee is also concerned about the lack of adequate measures adopted to increase the rates of breastfeeding."
https://www.sustainweb.org/righttofood/what_is_our_government_doing/

Q 13 Perhaps legislation would be Required, if the Commission is to operate effectively and be accountable for public funds but see what has been achieved by the Toronto Food Policy Council. Note: population of the Toronto Greater Metropolitan area is 6.3 million <https://cihr-irsc.gc.ca/e/47602.html>

Q 14

This essentially requires political will, adequate funding, and local priorities.

Q 15. Do you agree with the inclusion of a Primary Food Goal supplemented by Secondary Food Goals?

The Bill is far too ambitious, and we should focus on precise deliverables involving public funds. I have concluded, [given the perilous financial position of most public bodies in meeting their statutory obligations](#), that all levels of government should sharply focus upon public health and how we can effectively deliver free, nutritious, acceptable school meals across our schools system. This should include improving pay and conditions to ensure well trained staff are in place to deliver this vital service.

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

The Bill is far too ambitious, and we should focus on precise deliverables involving public funds. I have concluded that all levels of government should sharply focus upon public health and how we can

effectively deliver free, nutritious, acceptable school meals across our schools system. This should include improving pay and conditions to ensure well trained staff are in place to deliver this vital service.

17. Do you have any additional comments on the Food Goals, including the resource implications of the proposals and how these could be minimised?

The Bill is far too ambitious, and we should focus on precise deliverables involving public funds. I have concluded that all levels of government should sharply focus upon public health and how we can effectively deliver free, nutritious, acceptable school meals across our schools system. This should include improving pay and conditions to ensure well trained staff are in place to deliver this vital service.

18. Please provide your views on the inclusion of targets within the Bill as the means to measure how the Food Goals are being advanced.

They are too complex and need to be simple. The Bill is far too ambitious, and we should focus on precise deliverables involving public funds. I have concluded that all levels of government should sharply focus upon public health and how we can effectively deliver free, nutritious, acceptable school meals across our schools system. This should include improving pay and conditions to ensure well trained staff are in place to deliver this vital service.

19. Do you agree with the process for setting the targets?

The Bill is far too ambitious, and we should focus on precise deliverables involving public funds. I have concluded that all levels of government should sharply focus upon public health and how we can effectively deliver free, nutritious, acceptable school meals across our schools system. This should include improving pay and conditions to ensure well trained staff are in place to deliver this vital service.

20. Do you think the reporting mechanisms set out in the draft Bill provide sufficient accountability and scope for scrutiny?

The Bill is far too ambitious, and we should focus on precise deliverables involving public funds. I have concluded that all levels of government should sharply focus upon public health and how we can effectively deliver free, nutritious, acceptable school meals across our schools system. This should include improving pay and conditions to ensure well trained staff are in place to deliver this vital service.

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

The Bill is far too ambitious, and we should focus on precise deliverables involving public funds. I have concluded that all levels of government should sharply focus upon public health and how we can effectively deliver free, nutritious, acceptable school meals across our schools system. This should include improving pay and conditions to ensure well trained staff are in place to deliver this vital service.

22. What are your views on the need for a Welsh Food Commission?

Mixed - as someone who publicly proposed a Welsh Food Commission in early 2003.

I doubt a Commission would be required for government to focus on precise deliverables involving public funds. I have concluded that all levels of government should sharply focus upon public health and how we can effectively deliver free, nutritious, acceptable school meals across our schools system. This should include improving pay and conditions to ensure well trained staff are in place to deliver this vital service.

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

The Bill is far too ambitious, and we should focus on precise deliverables involving public funds. I would suggest both the Senedd and any WFC should look to **growing** inequalities affecting lifestyle and longevity. How to listen to local communities, assess needs and take action to alleviate them would be a key challenge. Action on health inequalities must be locally based with an emphasis on co-operative principles and grassroots participation.

All levels of government should sharply focus upon public health and how we can effectively deliver free, nutritious, acceptable school meals across our schools system. This should include improving pay and conditions to ensure well trained staff are in place to deliver this vital service.

24. Do you agree with the size of the membership of the Food Commission and the process for appointing its members?

It is unclear how, even with the proposed sized and appointment process the consumer voice would be heard above the well organised and funded industry lobbies.

25. 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?

Five years seems far too long. A system of rotation is required to ensure continuity of experience. Ten years for a member or chair?? 6 or 9 at the outside as with what I assume to be the current public appointment position.

26. Do you have any additional comments on the Food Commission, including the resource implications of the proposals and how these could be minimised?

All levels of government should sharply focus upon public health and how we can effectively deliver free, nutritious, acceptable school meals across our schools system. This should include improving pay and conditions to ensure well trained staff are in place to deliver this vital service.

Both the Senedd and any WFC should look to **growing** inequalities affecting lifestyle and longevity. How to listen to local communities, assess needs and take action to alleviate them would be a key challenge. Action on health inequalities must be locally based with an emphasis on co-operative principles and grassroots participation.

27. Do you agree that there is a need for a national food strategy?

Norway has had a national food strategy from 1934. In Finland free school meals are universal. Current government strategy overly influenced by the agriculture industry. However, what is proposed is far too ambitious in the present climate and call on limited public funds. All levels of government should sharply focus upon public health and how we can effectively deliver free, nutritious, acceptable school meals across our schools system. This should include improving pay and conditions to ensure well trained staff are in place to deliver this vital service.

The UK requires such. See, for example, https://www.sustainweb.org/righttofood/what_is_our_government_doing/

28. No, but I would argue it is far too much influenced by the agriculture industry.

29. Probably, but this is all down to political will and availability of adequate resources and the capacity to use them creatively.

30. Probably, how will this relate to the locality and addressing health inequalities?

31 WFC should look to [growing](#) inequalities affecting lifestyle and longevity. How to listen to local communities, assess needs and take action to alleviate them would be a key challenge. Action on health inequalities must be locally based with an emphasis on co-operative principles and grassroots participation.

32 WFC should look to [growing](#) inequalities affecting lifestyle and longevity. How to listen to local communities, assess needs and take action to alleviate them would be a key challenge. Action on health inequalities must be locally based with an emphasis on co-operative principles and grassroots participation.

33. Do you agree that there is a need for local food plans?

Yes, but strongly suspect variability in capita spend and delivery at the local authority level. [Where it is most needed this would be real challenge recognising the extreme difficulties due to inadequate funding.](#)

34. 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?

WFC should look to [growing](#) inequalities affecting lifestyle and longevity. How to listen to local communities, assess needs and take action to alleviate them would be a key challenge. Action on health inequalities must be locally based with an emphasis on co-operative principles and grassroots participation. [A concern that where it is most needed this would be real challenge recognising the extreme difficulties due to inadequate funding.](#)

35. 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?

[See 34 above.](#)

36. 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?

Unknown. WFC should look to [growing](#) inequalities affecting lifestyle and longevity. How to listen to local communities, assess needs and take action to alleviate them would be a key challenge. Action on health inequalities must be locally based with an emphasis on co-operative principles and grassroots participation.

37. Do you have any additional comments on local food plans, including the resource implications of the proposals and how these could be minimised?

WFC should look to [growing](#) inequalities affecting lifestyle and longevity. How to listen to local communities, assess needs and take action to alleviate them would be a key challenge. Action on health inequalities must be locally based with an emphasis on co-operative principles and grassroots

participation. Unclear what is meant by minimised? Digital excluding vulnerable people? If it's to be done at all it should be properly resourced.

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

Probably

39. Do you have any views on the process for making regulations set out in the Bill?

This should flow from how we listen to local communities, assess needs, and take action to alleviate them would be a key challenge. Action on health inequalities must be locally based with an emphasis on co-operative principles and grassroots participation.

40. Do you have any views on the proposed commencement date for the Act?

Government should sharply focus upon public health and how we can effectively deliver free, nutritious, acceptable school meals across our schools system. This should include improving pay and conditions to ensure well trained staff are in place to deliver this vital service.

41. Additional Information

41.1. Having publicly championed the Welsh Food Council in 2003, I conclude, with the continuing cost of living crisis that all levels of government should sharply focus upon public health and how we can effectively deliver free, nutritious, acceptable school meals across our schools system. This should include improving pay and conditions to ensure well trained staff are in place to deliver this vital service.

.41. 2 WFC should look to growing inequalities affecting lifestyle and longevity. How to listen to local communities, assess needs and take action to alleviate them would be a key challenge. Action on health inequalities must be locally based with an emphasis on co-operative principles and grassroots participation.

Updated for Senedd consultation 27 January 2023.

David Smith is a serial co-operative activist and former Team Leader of the first EC funded Anti-Poverty Programme. Former Government Food Adviser / member of the Food Standards Agency Wales Food Advisory Committee (2000-2006). He served as an elected member on the Main Group Board of the Co-operative Group. He founded the Welsh Food Alliance in 1999 and served as its Food Policy Adviser until July 2011. David has eighteen years experience in running a small catering business and sixteen years as a former Further Education Food Lecturer at Gwent Tertiary College. Currently, he is Secretary of Co-ops & Mutuels Wales and Board Member, Newport Credit Union.