
From: [REDACTED]
Sent: 30 January 2023 18:50
To: Irranca-Davies, Huw (Aelod o'r Senedd | Member of the Senedd); Legislation, Justice and Constitution Committee | Y Pwyllgor Deddfwriaeth, Cyfiawnder a'r Cyfansoddiad
Subject: Food Sense Wales LJC and Wellbeing of Future Generations Act
Attachments: FSW Evidence for 19.1.22.pdf; FPAC ETRA committee Draft Food Bill Jan 23.pdf; FSW Evidence for 19.1.22 (Cy).pdf
Importance: High
Categories: Correspondence



<p>Annwyl Huw</p> <p>Hyderaf eich bod yn cadw'n dda.</p> <p>Rwy'n ysgrifennu atoch yn rhinwedd eich rôl fel Cadeirydd y Pwyllgor Deddfwriaeth, Cyfiawnder a'r Cyfansoddiad ac mewn perthynas â'r craffu ar y Bil Bwyd (Cymru) drafft.</p> <p>Roeddwn yn meddwl y byddai'n ddefnyddiol, yn dilyn y sesiwn dystiolaeth gyda'r Gweinidog Materion Gwledig a Gogledd Cymru, a'r Trefnydd ar Ionawr 23ain, i dynnu sylw at dystiolaeth a gyflwynwyd gan Synnwyr Bwyd Cymru mewn perthynas â'r Bil Bwyd (Cymru) drafft ac yn benodol, sut y mae'r Bil arfaethedig yn ymdrin â Deddf Llesiant Cenedlaethau'r Dyfodol (Cymru).</p> <p>Rydym wedi darparu tystiolaeth ar 3 achlysur yn ymwneud â'r Bil:</p>	<p>Dear Huw,</p> <p>I trust you are keeping well.</p> <p>I am writing to you in your position as Chair of the Legislation, Justice and Constitution Committee and in relation to the scrutiny on the draft Food (Wales) Bill.</p> <p>I thought it would be helpful, following the evidence session with the Minister for Rural Affairs and North Wales, and Trefnydd on 23rd January, to highlight evidence submitted by Food Sense Wales in regard of the draft Food (Wales) Bill and in particular, how the proposed Bill deals with the Wellbeing of Future Generations (Wales) Act.</p> <p>We have provided evidence on 3 occasions relating to the Bill:</p>
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<p>1. Yn ein rôl fel ysgrifenyddiaeth ac fel aelod o Gynghrair Polisi Bwyd Cymru i ymgynghoriad yr haf ar y Bil drafft. Tynnaf eich sylw at yr adran sy'n ymdrin â rhyngwyneb y Bil arfaethedig a Deddf Llesiant Cenedlaethau'r Dyfodol. Ymgynghorwyd â swyddfa Comisiynydd Cenedlaethau'r Dyfodol ar y cyflwyniad hwn. Ymateb BilBwydCymru Cymraeg.pdf (foodsensewales.org.uk). Y Berthynas Rhwng Deddf Llesiant Cenedlaethau'r Dyfodol (Cymru) a Bil Drafft Bwyd (Cymru) tud 2-3</p> <p>2. Tystiolaeth ysgrifenedig (ynghlwm) a llafar gan Synnwyr Bwyd Cymru a ddarparwyd i Bwyllgor yr Economi, Masnach a Materion Gwledig ar gyfer sesiwn Ionawr 19eg. Yn benodol, tynnaf eich sylw at y sesiwn dystiolaeth a fy ymateb i'r cwestiwn gan Samuel Kurtz AS ynghylch rôl Comisiynydd Cenedlaethau'r Dyfodol. (248-250) Pwyllgor yr Economi, Masnach a Materion Gwledig 19/01/2023 - Senedd Cymru</p> <p>3. Tystiolaeth a gasglwyd gan Gynghrair Polisi Bwyd Cymru, yn enwedig yn tynnu sylw at rai o'r prif lwybrau ymholi o'r 4 sesiwn o Bwyllgor yr Economi, Masnach a Materion Gwledig hyd yma (ynghlwm)</p> <p>Byddai Synnwyr Bwyd Cymru yn fwy na pharod i egluro unrhyw beth o fewn y ddogfen amgaaedig neu ddarparu tystiolaeth bellach pe bai angen yn ystod y broses graffu.</p> <p>Cofion cynnes,</p> <p>Katie</p>	<p>1. In our role as secretariat and member of Food Policy Alliance Cymru to the summer consultation on the draft Bill. I draw your attention to the section that deals with the interface of the proposed Bill with that of the Wellbeing of Future Generations Act. We consulted with the Future Generations Commissioners office on this submission. Draft-Food-Wales-Bill-consultation-response Eng.pdf (foodsensewales.org.uk) . Ref Section A: Interface Between Wellbeing of Future Generations (Wales) Act and the Draft Food (Wales Bill) pg 2-3</p> <p>2. Written and oral evidence (attached) from Food Sense Wales provided to the Economy, Trade, and Rural Affairs Committee for the 19th January session. In particular I draw your attention to the evidence session and my response to the question from Samuel Kurtz MS regarding the role of the Future Generations Commissioner. (248-250) Economy, Trade, and Rural Affairs Committee 19/01/2023 - Welsh Parliament (senedd.wales)</p> <p>3. Evidence compiled by Food Policy Alliance Cymru, particularly drawing out some of the main lines of enquiry from the 4 Economy, Trade, and Rural Affairs Committee sessions to date (attached)</p> <p>Food Sense Wales would be more than happy to clarify anything within the enclosed or provide further evidence if required during the scrutiny process.</p> <p>Kind regards,</p> <p>Katie</p>
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Katie Palmer
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We welcome correspondence in Welsh. We will respond in Welsh without delay.**

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

Katie Palmer, Food Sense Wales 21.12.22

1. The Bill brings forward a meaningful framework and accountability measures to enable a proactive approach, determining how we want our food system to work, rather than just dealing with the consequences. We view the Bill as essential **to bring about coherent and comprehensive policy** that will achieve the goal of delivering a food system fit for future generations.
2. As an organisation operating across the Food System - cutting across the third sector and public sector - Food Sense Wales is acutely aware that the absence of a holistic vision and targets for the food system in Wales is hampering the progress that Wales could be making in becoming one of the most sustainable and resilient food nations in the world. The food system could be delivering on population health, food security, net zero and biodiversity targets and fair work. In reality a lack of policy coherence actively prevents this from happening – and could even be making the situation worse. Bringing experts across the Food System together under the banner of a Food Commission, to develop and oversee strategy, would ensure all parts of the system are aiming for the same goal.
3. In particular I would like **to emphasize the opportunities through linking national vision and policy with local strategy and delivery**. At a local level Food Goals could be built into Wellbeing Objectives and delivered through local food plans overseen at a local level by cross sector **Food Partnerships** working in conjunction with Public Service Boards. Examples of where this practice is already developing can be seen through the emerging Network of 7 Sustainable Food Partnerships¹ and in particular Blaenau Gwent Food, Bwyd Sir Gar, Food Cardiff, Monmouthshire Food and Food Vale. Food Cardiff's Good Food Strategy for the city which sets out five food goals - a healthy Cardiff; an environmentally sustainable Cardiff; a thriving local economy; a fair and connected food system; and an empowering food movement. This strategy was co-produced by almost 2,500 individuals and organisations in Cardiff and the results from the Cardiff citizen survey. Cardiff Council and Cardiff & Vale UHB. Cardiff Council became one of the first UK local authorities to publish its own Food Strategy in 2019. Recognising the need to work across portfolios, Cardiff Council have appointed a dedicated Food Officer and host a cross-departmental Steering Group. The Move More, Eat Well Plan led by Cardiff & Vale University Health Board and approved by both PSBs includes a health communities' priority area, committing to the continued development of sustainable food partnerships. **Cardiff's draft Wellbeing Plan** includes "promote healthy, local, and low-carbon food and support Cardiff's bid to become the first Gold Sustainable Food Place in Wales"².

Providing adequate resourcing for training within public bodies and coordination of food partnerships would be key for successful implementation - work which could be progressed through the Community Food Strategy.

The committee may like to note that Welsh Government are in the process of investing £2.5m into the development of cross sector food partnerships through the Prosperous Futures Team.

4. As part of Food Policy Alliance Cymru we responded to the Food Bill Consultation where detailed responses to all aspects of the Bill were addressed

English - [Draft-Food-Wales-Bill-consultation-response_Eng.pdf \(foodsensewales.org.uk\)](#)

Welsh - [Ymateb BilBwydCymru_Cymraeg.pdf \(foodsensewales.org.uk\)](#)

We are pleased to see that the Bill has been strengthened on the environmental and education aspects.

¹ [Sustainable Food Places - foodsensewales.org.uk](#)

² [Cardiff-PSBs-Draft-Local-Well-being-Plan-2023-2028_English.pdf \(cardiffpartnership.co.uk\)](#) pg 48

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

Food Policy Alliance Cymru (FPAC) consultation response

27th January 2023

This response reflects discussion points raised at committee oral evidence sessions on 19th and 25th January 2023

A. An overarching umbrella (systems) approach to food-related policies

Primary legislation that puts the food system in the driving seat (rather than the back seat of other policy areas) provides an opportunity to build a consensus on a collective vision for our food system in Wales. It would enable planning and strategic development to build a more resilient and long-term statutory framework for food policy in Wales. A framework which would operate in and beyond political cycles and become solid, principled, long-term and institutionally embedded, for building food system resilience.

This Bill is important because to date policy incoherence has often led to mixed messages, missed opportunities and contradictory approaches.

We do not feel that syphoning off aspects of this proposed Bill into other parts of legislation (e.g. Agriculture (Wales) Bill or Social Partnerships and Procurement Bill) would be a satisfactory approach as it would still lead to, or even exacerbate policy incoherence. For example, whilst the Social Partnerships and Procurement Bill may link into aspects of procurement within local food plans, it wouldn't take into account aspects such as those detailed in the Health and Social secondary food goal, for example actions to alleviate household food insecurity.

An example of a failure of coherence in Welsh Food policy can be seen in the proliferation of Intensive Poultry Units (IPUs) and their devastating impact on Welsh rivers. Farmers have been encouraged to diversify into poultry units to increase economic security and food production, but there was clearly a failure to consider the environmental impacts of this. In particular the cumulative effect of multiple IPUs in the same catchment area have been ignored and local authorities lack the planning controls needed to control them. Welsh Government is now rightly proposing to incentivise sustainable farming practices, through the Sustainable Farming Scheme; however, the scheme and Agriculture (Wales) Bill include no mention of planning policy and nothing that would prevent this environmentally devastating farming continuing, even by farmers receiving SFS payments.

B. Integrated approach to Food goals

The secondary food goals outlined in the consultation are sectoral and work against the need to take an integrated approach to the food system. It is also worth noting that the Food Waste goal could sit within the Environment Goal since globally food waste contributes between 8 and 10 per cent of total greenhouse gas emissions. FPAC have suggested alternative Food Goals as detailed in our summer consultation response¹, targets for which would be set by the Commission. Here we propose that they could be integrated with the draft Bill as follows:

¹ https://www.foodsensewales.org.uk/app/uploads/2022/10/Draft-Food-Wales-Bill-consultation-response_Eng.pdf

Goal (Draft Food Bill)	Description (FPAC suggestion)
Economic well-being	<ul style="list-style-type: none"> • Sustainable food sector jobs and livelihoods: Those who earn their living within the food system receive, or are enabled to receive, at least the living wage or a fair return for their work and work is free from exploitative practices, and is varied, engaging and empowering (100% of job paying real living wage by 2030) • Sustainable food procurement: Increased public procurement of food from organic or agroecological Welsh producers (30% by 2030)
Health & Social	<ul style="list-style-type: none"> • Food for all: Wales becomes the first nation to eliminate the need for food banks (by 2030). Everyone in Wales has access to the food they need in a dignified way, in order to live a healthy life. • Food for public health: Increased consumption of vegetables, which are produced sustainably in Wales for Wales (75% of Eatwell veg portions by 2030).
Education	<ul style="list-style-type: none"> • Educational provision on food related issues in each key stage in all schools.
Environment	<ul style="list-style-type: none"> • Farming for nature and climate: Increased amount of agroecological production (100% by 2035). • Net Zero food system: A net zero food system for Wales (by 2035). • Global environmental footprint: a 75% reduction in the environmental footprint of food production and consumption at home and overseas by 2035.
Waste	(addressed within Environment and Economic well-being goals)

We would support an overarching requirement that goals be considered together and where a measure to advance one goal is developed; it's impacts on the other goals be considered.

C. Length of time of the legislative process

The legislation is critical for creating long-term sustainability of the Welsh Food System that supersedes political cycles. The legislative process does not prevent the advancement of food-related policies in the meantime and indeed, the process of debating, consulting on and further developing the Food (Wales) Bill will serve to lay the ground for the forthcoming legislation (while recognising the continuing absence of a Commission during this period and the critical role it would play in providing the oversight to ensure better integration across departments of food-related policies). An example would be the Programme for Government commitment to develop a Community Food Strategy. This strategy could form the basis of developing the infrastructure

needed to support public bodies to develop and deliver on local food plans, work that is already progressing through Welsh Government's £2.5m investment in cross-sector food partnerships².

D. Format and role of the Commission and a Commissioner

The Bill has fallen short of suggesting a dedicated Food Commissioner for Wales. We feel that a Food Commissioner, together with the Food Commission, should hold responsibility for carrying out the process of co-production (collaboration and involvement) to develop the Wales National Food Strategy, from the ground up. The Commission would present a draft Strategy, based on co-production principles, to Welsh Ministers for approval. The Commission leading on this process will help ensure that the strategy is integrated across WG departmental priorities.

The requirement for integration and collaboration means that public bodies and Ministers need to work together to seek synergies and align policy across departments in support of its vision of well-being for current and future generations— this is what the Food Bill should seek to do for food-related policies, based on the co-produced Wales National Food Strategy. The Food Commission's role should be to navigate the process of integration of food-related policies across Ministers' portfolio. A Food Commissioner, rather than a Chair of the Food Commission, would carry the responsibility for navigating this process and provide a figurehead that is recognised by the wider Food System community.

E. UK and international Context

Under the current circumstances it would seem both pragmatic and strategic for the Welsh Parliament to build a more resilient and long-term statutory framework for its food policy. Many of the central policy fields that impinge upon our food system (i.e. trade policy, regional economic policy, environmental policy, food and farming policy) are now becoming more (rather than less) vulnerable to partisan party politics and the relatively short political cycles. The political consensus around support schemes has diminished, and, indeed with the UK wide de-regulation of remaining EU regulations due to its 'sunset' clause by the end of 2023, (i.e. the Retained EU Law (Revocation and Reform Bill, currently being processed in UK Parliament), we are likely to witness further deregulations. In addition, recent experiences from Westminster demonstrate that without legislation to enforce, and the lack of a mechanism such as a Food Commission(er) to influence, even well researched, thoroughly consulted upon and supported Food Strategies (Henry Dimbleby's National Food Strategy) can be largely ignored or de-prioritised by Government.

F. How can the Food Bill facilitate access to new Markets?

The Bill can facilitate new markets by bringing together different government departments and public bodies and working with relevant private and community sector organisations to develop new routes to market.

An example of how working across the food system in an integrated way could create new local and sustainable supply chains whilst promoting food education in schools is the Courgette Pilot³. This

² <https://www.foodsensewales.org.uk/minister-for-social-justice-announces-support-for-food-partnerships-across-wales/>

³ <https://www.foodsensewales.org.uk/welsh-veg-for-primary-schools-in-wales-how-a-new-sustainable-supply-chain-investment-scheme-could-drive-up-agroecological-veg-production/>

pilot saw courgettes from Blas Gwent, a south Wales-based agroecological grower being delivered to schools in Cardiff via Wales-based wholesaler, Castell Howell with the support of the Sustainable Food Partnership, Food Cardiff, Cardiff City Council and the participating schools.

If Welsh Government committed to every primary school meal containing 2 portions of veg next school year then they would have to supply 5331 tonnes of veg into schools. If this was all from agroecologically produced Welsh veg then this would generate a guaranteed market for agroecological producers in Wales of around £15m. This would involve doubling the area growing field veg in Wales and would support nearly 100 businesses employing nearly 1000 people. It would also have the knock-on effect of developing a regionalised and resilient network of food producers able to supply veg into the heart of their communities.

G. Definitions

FPAC have some concerns around the definition of 'local food' in the Bill – local food is not always the most environmentally sustainable (or healthy) food. The Welsh Food Commission should have the ability to define 'local food' with this in mind. Any definition of local food should consider the methods of production such as organic standards, Food for Life Served Here awards, Pasture for Life and Fairtrade.

[Food Policy Alliance Cymru](#) is a coalition of organisations and stakeholders building and promoting a collective vision for the Welsh food system.

Through collaboration, engagement and research the Alliance aims to:

- Co-produce a vision for a food system in Wales that connects production, supply and consumption and gives equal consideration to the health and wellbeing of people and nature.
- Advocate for policy change to address climate and ecological emergencies, the public health crisis and the rise in food insecurity.
- Ensure Wales is linked to UK policy, research opportunities and the broader global system

The following members of Food Policy Alliance Cymru have contributed to this response:

Food Sense Wales; Social Farms & Gardens; Gweithwyr y Tir - Landworkers' Alliance Cymru; Urban Agriculture Consortium; Nature Friendly Farming Network Cymru; WWF Cymru; RSPB Cymru; Soil Association Cymru; Dr Angelina Sanderson Bellamy, Association Professor of Food Systems, UWE Bristol; Prof Terry Marsden, Cardiff University; Simon Wright, Director of Food and Rural Economy, University of Wales Trinity Saint David

This consultation may be published and will also be published on

<https://www.foodsensewales.org.uk/good-food-advocacy/food-policy-alliance-cymru/>

Any queries may be directed to foodsensewales@wales.nhs.uk