

## Size of Wales - Consultation Response

### Food Poverty and Healthy Food Access in Wales

#### **1. To what extent does the Welsh Government's approach support provision of healthy and nutritious food for all, and what actions could it take?**

The Welsh Government's current approach shows positive intent through introducing free school meals and initiatives such as the veg in schools.

However, the approach remains insufficient because it defines "healthy" too narrowly in nutritional terms and does not adequately address:

- The dominance of ultra-processed foods (UPFs) in children's diets,
- The sustainability and provenance of food,
- The embedded environmental and social risks within food supply chains (e.g. soy and palm-based animal feeds linked to tropical deforestation).

As a result, the approach does not yet fully support long-term, equitable access to healthy and nutritious food and the goal of being a globally responsible nation.

#### **The Welsh Government could strengthen its approach by:**

- Embedding sustainability and provenance standards into school food regulations and procurement.
- Adopting a "less but better" model for meat and dairy, supplemented with plant proteins.
- Explicitly defining and restricting UPFs in school food and food education.
- Supporting a whole-school approach to food, including education, co-design with learners, and practical cooking and growing opportunities.

#### **2. What are the main barriers to addressing food poverty sustainably and preventatively, and how can they be overcome?**

##### **Main barriers:**

- Budgetary constraints on local authorities.
- Lack of clear action on UPFs.
- Embedded deforestation and social risks within "local" food supply chains.
- Risk of reduced uptake if healthier menus are imposed without engagement.
- Limited capacity for whole-school food education and cultural change.

##### **How these can be overcome:**

#### **1. Put Food at the Centre of Government Policy**

Food should be treated as core national infrastructure, not a peripheral issue. Welsh Government should adopt a cross-government food strategy that links health, climate, nature, education, farming, procurement and social justice, with clear accountability and targets.

#### **2. Shift Public Procurement to Drive Change**

Public sector food purchasing should be used as a lever for transformation by:

- Leveraging **bulk purchasing and guaranteed demand** to make healthy, ethical food affordable at scale.
- Improving access to public contracts for **small, Welsh, organic, agroecological and ethical producers**.
- Excluding ingredients linked to **deforestation and ecosystem destruction**, particularly soy, palm oil and imported beef from high-risk regions.
- Applying a **social value framework** so procurement decisions consider long-term health, climate, biodiversity and social outcomes, not just lowest price.

### 3. Adopt a “Less but Better” Food Model

To balance cost, health and sustainability:

- Reduce overall meat and dairy volumes while improving their quality (pasture-fed, organic, nature-friendly systems).
- Replace part of animal protein with **plant proteins** (beans, lentils, pulses, peas), maintaining nutritional value while reducing cost and environmental impact.
- Reformulate popular dishes rather than removing them, ensuring acceptability and uptake.

This reduces deforestation risk, lowers emissions, improves dietary quality and keeps meals affordable.

### 4. Build Food Literacy and Food Citizenship

Every child should leave school food-literate. This means understanding where food comes from, how it affects their health, climate and nature, and how to prepare it.

This requires:

- Whole-school food education, including UPFs, marketing literacy, sustainability and cooking skills.
- Curriculum integration of food systems, climate and health.
- Opportunities to grow, cook, share and design food in schools and connect with farmers / food producers.
- Investment in staff training and time for food activities.

### 5. Empower Communities and Learners

Food policy should be co-created with those it affects.

- Involve pupils, families and communities in menu design and food decisions.
- Support community food partnerships, community growing and local food infrastructure.
- Recognise young people as agents of change, not passive recipients.

This improves uptake, reduces stigma, strengthens cultural connection to food, and builds lasting behaviour change.

### 6. Explicitly Address Ultra-Processed Foods (UPFs)

UPFs should be clearly defined and actively reduced in public food provision and education.

- Restrict their presence in schools and public settings.
- Teach children and families about their health, social and environmental impacts.
- Align food standards with long-term public health goals.

Reducing UPFs is a preventative investment in physical, mental and planetary health.

## 7. Build Food System Resilience and Equity

Food poverty should be addressed structurally, not just through emergency response.

This means:

- Increasing Welsh fruit, vegetable and pulse production (edible horticulture).
- Supporting farmers to transition to nature-friendly and deforestation-free systems.
- Strengthening local supply chains to reduce dependence on volatile global markets.
- Ensuring everyone can access affordable, healthy food regardless of income.

Emergency food aid remains necessary, but should sit within a wider strategy of prevention and resilience.

## 3. Which examples of good practice tackle food poverty effectively and how should they be supported?

The **Deforestation Free Chickpea Korma**<sup>1</sup> pilot in Monmouthshire developed by Size of Wales demonstrates good practice by:

- Engaging pupils in auditing their own meals for environmental and social impacts.
- Enabling pupils to co-design healthier, sustainable alternatives.
- Linking food choices to climate, nature and global responsibility.
- This approach successfully combined nutrition, sustainability and learner agency, and showed early evidence of sustained engagement.

## 4. Does the approach sufficiently balance emergency support and prevention?

The current approach does not yet strike an adequate balance. While emergency food provision is necessary, the submission highlights that without strong preventative measures, particularly around UPFs, food education, and food system sustainability, long-term food poverty and poor health outcomes will persist.

### The Welsh Government should:

- Anchor prevention within universal school food provision, ensuring high quality, nutritious and sustainable meals.
- Integrate food education, advertising literacy, cooking skills and growing activities into school life.
- Use a social value approach to justify preventative investment based on long-term health, environmental and economic benefits.

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<sup>1</sup> Pupils identified that the chicken korma dish had a high deforestation risk as the chicken was likely to be fed on soy. As a result, the pupils redesigned menu using chickpeas and other beans and pulses. This dish was approximately 10p cheaper per portion than the chicken version, provided the same amount of protein and had a significantly lower environmental footprint. Crucially, involving pupils directly in designing the recipe increased their engagement and willingness to eat the dish, demonstrating that co-creation can support healthier, more sustainable food choices without increasing costs or reducing nutritional value.