



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

Overview

WWF Cymru have contributed to the development of the Bill, and we 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 several areas.

Our key points include:

- Primary legislation provides an opportunity to 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.
- As the primary and secondary food goals currently stand, we question whether they are explicit or holistic enough to recognise the environment as the foundation to an economically and socially healthy food system. Without rising to the challenges we face on climate change and environmental degradation, we will be unable to meet the food needs of future generations.
- WWF Cymru particularly welcome the secondary goal that minimises Wales' global environmental footprint. 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.
- The integrated delivery of secondary foods goals is essential in avoiding cherry-picking goals and objectives.
- Embedding agroecological principles within the Bill and therefore across the National Food Strategy and local food plans would be the best way forward to ensure a well-connected and resilient farm-to-fork food system.
- 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.
- WWF Cymru hold some concerns around the definition of 'local food' in the Bill – local food is not always the most sustainable food. The Welsh Food Commission should have the ability to define 'local food' in an environmentally sustainable manner. 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*.

- There is a lack of substantive detail on how the Bill will be aligned with existing and upcoming Welsh legislation and policy to ensure its effectiveness.
- To ensure changes to Welsh land management via the Agriculture (Wales) Bill and Sustainable Farming Scheme are fully realised, the Food Bill must proscribe consideration of principles such as the 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 *A Welsh Food System fit for Future Generations*¹ report.
- 1.2. Our food system is negatively impacting the environment, health and the economic well-being 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 product⁴. Wales is now one of the most nature depleted countries in the world with one in six species is 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 includes agricultural production, are the biggest drivers of nature's decline.⁵ Agriculture contributes 15% of Welsh greenhouse gas emissions,⁶ 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 feeds.⁷
- 1.3. At present food policy operates in silos, resulting in contradictory policy aims. For example, our report, *A Welsh Food System Fit for Future Generations*⁸ 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 Centre⁹ 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**

¹ Sustainable Places Research Institute, '[A Welsh Food System Fit for Future Generations](#)', (WWF Cymru; March 2020).

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 Sustain (2022) [Unpicking food prices: Where does your food pound go, and why do farmers get so little? | Sustain \(sustainweb.org\)](#)

⁵ Hayhow DB, Eaton MA, Stanbury AJ, et al, '[The State of Nature 2019](#)', (The State of Nature partnership; 2019).

⁶ NetZero Wales, '[2020 Wales Greenhouse Gas Emissions](#)', (Welsh Government; 2019).

⁷ 3Keel, '[Wales and Global Responsibility](#)', (WWF Cymru, RSPB Cymru, and Size of Wales; 2021).

⁸ Sustainable Places Research Institute, '[A Welsh Food System Fit for Future Generations](#)' (WWF Cymru; March 2020).

⁹ Stockholm Resilience Centre, '[Sustainable Development Goals: The SDGs wedding cake](#)', (2016).

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

2.1. Primary legislation can be the most effective tool for developing a joined-up system of effective governance and accountability. It provides an opportunity to enable long term planning and strategic development. Given how vulnerable our food system is, it would seem both pragmatic and strategic for the Senedd to build a more resilient and long-term statutory framework for its food policy. A framework which would operate in and beyond political cycles and become solid, principled, long-term and institutionally embedded, for building food system resilience against a backdrop of recent external events and processes (Brexit, Covid, the Ukrainian war and the long-running impacts of climate change for example), which are demonstrating that food systems are highly vulnerable. 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 Wales 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 with Food Policy Alliance Cymru. Our 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. Descriptions and associated targets were submitted within our initial response,¹⁰ and WWF Cymru would welcome the incorporation of these targets within the Bill.
- 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. The environmental goals should incorporate existing environmental legislation and commitments more effectively, including the Environment (Wales) Act 2016. Specific objectives should include, *'a food system that restores, maintains and enhances biodiversity and the resilience of ecosystems, and utilises and manages natural resources sustainably'*.¹¹
- 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 the environmental footprint¹² 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 Responsibility*¹³, a report by WWF, 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*

¹⁰ WWF Cymru, ['Response to the Food \(Wales\) Bill FB018'](#), (Senedd Cymru; 2022).

¹¹ WWF Cymru, ['Response to the Food \(Wales\) Bill FB018'](#), (Senedd Cymru; 2022).

¹² WWF UK, ['Thriving within our Planetary Means'](#), (WWF UK; 2021)

¹³ 3Keel, ['Wales and Global Responsibility'](#), (WWF Cymru, RSPB Cymru, and Size of Wales; 2021).

average year between 2011- 2018, causing deforestation, habitat conversion, greenhouse gas (GHG) emissions, and risking exploitative labour practices’.

Considering the above commodities, it is clear that Wales’ food sector has a large overseas deforestation and habitat loss footprint.

- 3.5. 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.
- 3.6. **Rather than setting one target that covers all aspects of the Environment food goal, 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.**
- 3.7. 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.
- 3.8. **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 our *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 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 other policy and legislation such as the Well-Being of Future Generations (Wales) Act 2015, the sustainable management of natural resources, the Equality Act 2010 and Welsh Government Equality Action Plans, amongst others.
- 4.3. WWF would stress the importance of the Commission consulting 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 should include 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. WWF Cymru welcome the draft Bill’s intention 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.

- 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. However, we recognise the balance of power is often in favour of those with time, resources, and access to governing authorities at national and local level. The range of actors involved in any co-production should therefore be given equal and proportionate input.
- 5.3. 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.
- 5.4. 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 wellbeing 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.

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. WWF Cymru suggest that 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 Procurement (Wales) Bill should be 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.¹⁴
- 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.
- 6.8. Large food retailers are currently the main provider of government funded support such as Healthy Start vouchers¹⁵. By extending the providers of these vouchers to include smaller, local, sustainable food providers such as Community Supported Agriculture schemes (CSAs) and others, the reach of these schemes is widened, and unequal economic advantages within food retail are reduced.¹⁶

¹⁴ WWF, '[Farming with Biodiversity. Towards nature-positive production at scale.](#)' (WWF International, Gland, Switzerland: 2021).

¹⁵ Sustain, '[Unpicking food prices: Where does your food pound go, and why do farmers get so little?](#)', (2 December 2022).

¹⁶ Dr Caroline Verfuert and Dr Angelina Sanderson Bellamy, '[Accessible Veg: A pilot project exploring the barriers and benefits to CSA membership for food insecure households](#)', (TGrains; June 2022).

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

- 7.1. WWF Cymru hold some concerns around the definition of 'local food' in the Bill – **local food is not always the most sustainable food.** The Welsh Food Commission should have the ability to define 'local food' in an environmentally sustainable manner. 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*, for example, to ensure sustainable farming methods are being prioritised and integrated into the strategy. The definition of local food should also relate to food grown in a specified area or region, rather than sourced from a local supplier who may stock food from a non-local area.
- 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. **This bill must align with and complement existing and 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'.

8. Appropriateness of Powers for the Development of Subordinate Legislation by Welsh Ministers

- 8.1. We agree the powers for the development of subordinate legislation are appropriate. However, powers should include the requirement for Welsh Ministers to co-produce subordinate legislation.

9. Unintended Consequences Arising from the Bill

- 9.1. WWF Cymru will only support the Bill if the environment forms a key part of the principles within it. At present, although the Bill does include reference to the environment in the primary and secondary food goals, **we question whether these goals are explicit or holistic enough in recognising how crucial the food system is in tackling the urgent climate and biodiversity crises.** The UK's first Food Security Report concluded that "The biggest medium to long term risk to the UK's domestic production comes from climate change and other environmental pressures like soil degradation, water quality and biodiversity"¹⁷. Without rising to the challenges we face on climate change and environmental degradation, we will be unable to meet the food needs of future generations.

I gael mwy o wybodaeth, cysylltwch â / For more information, please contact: Tessa Marshall, e-bost/email: tmarshall@wwf.org.uk

¹⁷ Department for Environment, Food & Rural Affairs, '[United Kingdom Food Security Report 2021](#)', (UK Government; 16 December 2021).