

## ROCP 21, Size of Wales

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Senedd Cymru | Welsh Parliament

### **Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith | Climate Change, Environment, and Infrastructure Committee**

Adolygiad o flaenoriaethau'r Pwyllgor ar gyfer y Chweched Senedd | Review of the Committee's priorities for the Sixth Senedd

Ymateb gan Maint Cymru | Evidence from Size of Wales

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## Your views

### **1. What are your views on the Committee's three strategic priorities: Climate Change; Sustainable Communities; and Protecting and enhancing the natural environment?**

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As stated in our first response to the Committee, we welcome the targets set in legislation to reach net zero by 2050. Urgent action to reduce CO2 emissions – both domestic and embedded – must be the focus for the Committee which plays a key role in holding the Welsh Government to account.

We agree with the three priorities of Climate Change; Sustainable Communities; and Protecting and enhancing the natural environment.

Within, and stretching across these priorities, food production, global supply chains and domestic agriculture should be a continuous focus. (This is further outlined below).

### **2. To what extent are the Committee's three strategic priorities still relevant, reflecting on social, economic and environmental developments since they were set at the start of the Sixth Senedd?**

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#### Priority 1: Climate change

It was highlighted in the consumption emissions statement earlier this year, *Wales' Consumption Emissions Footprint*, that 'emissions embedded within imported goods and services... were the largest source of Wales' consumption emissions from 2002 to 2020'. Therefore, **addressing Wales' embedded emissions must be a key priority of the climate change portfolio and net zero plan.**

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Wales has a significant tropical forest footprint for imported commodities, including beef from South America, soy used in livestock feed, palm oil, coffee, cacao, timber, paper and pulp. [Research](#) commissioned by WWF Cymru, Size of Wales and RPSB Cymru shows how Welsh consumption of these commodities is driving deforestation, habitat loss and social impacts overseas.<sup>1</sup> Deforestation accounts for between 20 and 25% of all global emissions and is a major cause of global warming.

#### A snapshot of Wales' tropical forest footprint and related emissions:

- Wales' imports 190,000 tonnes of soy a year.
- Nearly 80% of this is fed to livestock in Wales, with poultry alone consuming 48%.
- Wales' soy imports require an average land area overseas equivalent to five times the size of Newport (94,600 hectares).
- **GHG emissions** from land use change for growing **Welsh imports of soy total over 1.1 million tonnes of CO2e each year**. That would equate to almost [20% of Welsh transport emissions](#) for 2019 at pre-pandemic levels. Reductions in transport emissions receives a lot of focus in Wales, especially recently with the moratorium on new road construction. However, despite the fact that soy cultivation alone results in significant greenhouse gas emissions, it receives very little attention at all. This demonstrates why it is essential that we annually monitor Wales' Global footprint indicator, as required under the Wellbeing of Future Generations Act and set targets to reduce our consumption emissions to avoid offshoring and making them someone else's responsibility.
- 53% of Wales' palm imports are fed to livestock.
- Nearly three-quarters of Wales' soy imports and 85% of palm oil imports fall in countries that are high or very high risk for deforestation and/or social issues, including Brazil, Indonesia and Malaysia.

This data is backed up by Welsh Government research carried out by the Joint Nature Conservation Committee (JNCC - the only statutory nature advisor to all four countries of the UK) called "Understanding the Global Environmental

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<sup>1</sup> [https://cdn.sizeofwales.org.uk/wp-content/uploads/2020/11/wwf\\_risky\\_b\\_wales.pdf](https://cdn.sizeofwales.org.uk/wp-content/uploads/2020/11/wwf_risky_b_wales.pdf)

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Footprint and Impacts of Welsh Consumption”.

<https://hub.jncc.gov.uk/assets/dc81dd16-9b1c-4eeb-b350-dcadd5ade736>

The report found that:

- Ecological Footprint: If the entire world population lived like the citizens of Wales, humanity would require 2.08 Earths.
- Material Footprint: In 2018, Wales used about 33,000 thousand tonnes of material in its supply chains to support its consumption.
- Global Environmental Impacts of Consumption (GEIC) Indicator: In 2018, Welsh consumption led to 669 to 884 ha of tropical and subtropical deforestation.
- Carbon Footprint: In 2020, 25 million tonnes of CO2 equivalent were released into the atmosphere to support Welsh consumption.

The report concludes that “overall, it is clear that Welsh consumption continues to have a large footprint and significant environmental impacts globally. However, the situation is improving with trends decreasing since 2004. The detailed understanding that the analyses in this report provide could be used to help target action towards the sectors/commodities and production locations associated with the highest footprints and impacts, in order to continue reducing this further”.

We are pleased to see that this report has been commissioned to measure greenhouse gas emissions caused by unsustainable forest-risk commodities and products that are imported into Wales. Now action needs to be taken to reduce these levels of consumption to reduce our global footprint - essential to meeting the Well-being of Future Generations Act National Well-being Indicators and Milestones.

## **Priority 2: Sustainable Communities**

The rejection of the proposed Food Bill earlier this year was a blow to Wales and its communities. Currently, there is no consistency in approach across Welsh Government departments and public bodies, meaning that implementation of food policy is patchy and fragmented. There are also increasing human and environmental health impacts from our current, unsustainable food system e.g. rising levels of obesity and diet-related disease, malnutrition, lack of access to

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healthy food - food deserts, affordability and cost of living crisis - nature loss and deforestation, to name but a few.

Ensuring public policy supports, promotes and facilitates the production of climate and nature friendly food would help increase our resilience to global impacts (e.g. the climate crisis, war in Ukraine, COVID pandemic), improve access to healthy food helping to tackle health inequalities, disease and consumption emissions, create local employment and support a just transition, and protect our life-giving ecosystems and forest communities overseas.

### **Priority 3: Protecting and enhancing the natural environment**

A key area that should be a focus for this priority is sustainable land management in Wales. We have ample evidence that our food and farming system can help to resolve the climate, nature, and health crises, if we move quickly and make the right choices. The [‘Ten Years for Agroecology in Europe’](#) study from French thinktank IDDRI demonstrated that we can feed a growing population a healthy diet, helping to tackle chronic disease, while phasing out fossil fuel and chemical inputs, protecting our pollinators, easing our environmental footprint overseas by reducing our dependence on soy feed, and regenerating our soils – but only if strides are taken this decade to achieve a ‘Ten-Year Transition’ to agroecology and sustainable diets. For more information about the campaign, see [here](#).

As stated above, soy imports alone are associated with 1.1 million tonnes of CO<sub>2</sub>e each year, so it is imperative that our use of imported animal feed is addressed. It is also important to point out the potential social impacts caused by soy cultivation, especially the abuse of Indigenous Peoples who have been displaced from their land to grow soy. Unfortunately, while the Net Zero Wales Carbon budget mentions animal feed it does not draw the links between our feed imports and emissions and therefore does not address the role Welsh agriculture plays in overseas emissions.

While there is promising direction in the Sustainable Farming Scheme with optional actions that will ‘help farmers work together to source feed as locally as possible’ this unfortunately does not go far enough in addressing this key issue.

A recent report from the Landworkers Alliance made it clear that addressing these imported emissions cannot be achieved by simply moving to locally produced feeds. Doing so would simply increase the land used in the UK for animal feed. In the case of poultry for example we would need to increase land use by 78%.

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There is no scenario where Wales can continue to produce the numbers of animals we are currently producing and grow all this livestock feed ourselves. Therefore, we need to combine options, introducing new feeds such as insect feed, grow our own where possible and look to reduce the numbers of animals we are producing. This is made clear in the [Soy No More](#) report which recommends that we should:

- Support an overall reduction in the consumption of pork, poultry, meat and eggs
- Support localised food systems and put control in the hands of farmers, not large corporations
- Be in line with a broader just transition towards a more sustainable food and farming system and the implications this will have on employment and training opportunities across all food industries.

While their recommendations are UK-wide, we could echo them here in Wales. We need a clear commitment and plans to reduce soy demand in agriculture by supporting the development of alternative feed and simultaneously reducing demand for animal products and meat in Welsh diets. This should be achieved by promoting better quality meat, reductions in ultra processed foods and transitioning diets to more plant-based proteins.

These actions are not just required to address the overseas footprint of Wales' animal agriculture, but also to address the impacts our current food system has here in Wales.

The 2019 State of Nature report found that 1 in 6 species are at risk of extinction in Wales and that agriculture is one of the largest drivers of this biodiversity loss. Buying in external animal feed enables us to produce livestock numbers above the carrying capacity of the land and that in turn pushes our natural resources beyond their limits. Addressing this imbalance is key to both addressing our overseas impacts and local impacts, whilst also helping us achieve emissions reductions.

### **3. What are your view on the Committee's detailed priorities/outline programme of work for Years 3 to 5 of the Sixth Senedd (set out in its report, [Priorities for the Sixth Senedd?](#))**

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#### Priority 1 - Climate change

Decarbonising the public sector should continue to be a focus in years 3-5.

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In the Net zero carbon status by 2030 report, it states that between 2021-2022, *'suppliers are sent a strong signal regarding future low carbon requirements and staff are trained.'* We have heard anecdotally that procurement teams – and those making procurement requests – do not always ask questions on the provenance of goods and services nor do they ask for ethical certifications, including fairtrade. This is despite the fact that the Welsh Government has in place a Sustainability Risk Assessment for contracts over £20K and that public bodies should be using procurement to contribute to their well-being objectives and S6 biodiversity duty.

The new procurement framework for food and catering, led by Caerphilly Council, which covers schools and civic sites etc. has embedded sustainability and deforestation free criteria within the tender framework for new contracts – this practice should be standardised, Wales-wide, across the public sector.

Furthermore, the Sustainable Partnerships and Public Procurement Bill fails to mention global responsibility at all, stating that 'a contracting authority must seek to improve the economic, social, environmental and cultural well-being **of its area** by carrying out public procurement in a socially responsible way.' This is despite the fact that Wales' procurement supply chains have a global footprint and that decisions made by a contracting authority have repercussions beyond the confines of its area. A coalition of Welsh NGOs, including Fairtrade and Size of Wales, called on the Welsh Government to specifically reference global responsibility on the face of the Bill. Unfortunately, amendments tabled were not approved. We are now working with the Welsh Government to help write the statutory guidance for the law. However, this shows there is still a great need to continue the work on decarbonising the public sector, with particular attention being paid to embedded emissions and global supply chains.

One way of decarbonising the public sector would be to embed Deforestation Free (DF) Procurement across the public sector as standard. Many countries and states are already doing this – most recently the New York Deforestation Free Procurement Act has passed in both houses and is soon due to become law. France also has a deforestation free strategy for all public sector procurement. <https://www.deforestationimportee.ecologie.gouv.fr/actualites-17/article/guide-d-achat-public-zero-deforestation>

Deforestation Free (DF) Procurement means putting in place policies and practices to reduce the procurement of unsustainable forest-risk commodities that are driving deforestation, nature loss and social impacts, in order to transition to a more sustainable and equitable food system. This means looking at the forest-risk commodities public bodies procure, whether as raw ingredients or processed foods, as products such as furniture, paper and cardboard, or services

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such as catering. It means working with suppliers and adopting ethical sourcing practices as much as possible. It also means taking steps to reduce consumption and waste, e.g. adopting the Reduce, Reuse, Recycle hierarchy and circularity.

Embedding DF Procurement across the public sector would not only help reduce our carbon/forest footprint, but it would also support a circular economy, ensure that workers' and Indigenous Peoples' rights are upheld and protected, and help us tackle biodiversity loss.

The finance sector is both inhibitor and agent for change. Pension funds invested in damaging practices are currently undermining the work businesses and organisations are doing to reduce climate impacts and transition to a lower-carbon economy. It is imperative now that they move any remaining investments away from climate-damaging companies and sectors as a matter of urgency. In May 2022, Senedd Members and Welsh Government backed a [motion](#) brought forward by Jack Sargeant MS which called for *'the Welsh Government to work with the public sector to agree a strategy to decarbonise pensions by 2030, thus bringing them into line with current public sector net-zero targets.'*

Pension funds must divest from and supply chains stop supporting deforestation risk companies. According to [Make My Money Matter](#) "For every £10 you put in your pension, £2 is linked to deforestation".

We need more information on the connection between the eight public sector pension funds in Wales and deforestation to enable an independent analysis of risk, for example by an organisation like Global Canopy. [Global Canopy](#) has already developed [guidance on how to achieve deforestation free pensions](#) which could be adopted for use in Wales.

## **Priority 2 – Sustainable communities**

Under this heading and the work on placemaking, access to affordable, climate and nature-friendly food, grown or reared locally should be a major focus in years 3-5. (For reasons described in previous comments).

## **Priority 3 – Protecting and enhancing the natural environment**

We support the Committee's aim to *'consider the Welsh Government's new arrangements for financial support for the agriculture sector from an environmental and sustainability perspective.'*

The Sustainable Farming Scheme (SFS) needs to make clearer reference to global responsibility in the document. The scheme should explicitly highlight how

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actions to grow more local animal feed is not only good for nature and climate in Wales, but that it also tackles the deforestation crisis, nature loss, the abuse of Indigenous Peoples' rights and climate change, and therefore contributes to the goal of a globally responsible Wales. This will make participation in the scheme more attractive if farmers understand the rationale behind these actions and why this is an important area.

It is positive that there is an optional action for farmers to be supported to grow crops in order to lower the amount of feed they buy in. **However, we believe that this action needs to be more clearly defined. A 'crop' is too wide a definition.** For example, more maize silage is likely to be bad for the environment, but more beans and peas/ forage grasses and pasture legumes that fix nitrogen in the soil, improve biodiversity, support flood and climate regulation, water purification, soil protection and carbon storage is something we would support. Ensuring a transition away from imported animal feed to home-grown feed that maximises benefits for climate and nature, and saves a farmer from buying in expensive inputs, is for us what the 'Welsh way' should look like.

**Furthermore, before even considering the need to grow crops for animal feed, the first principle should be for farmers to 'operate within the natural carrying capacity' of the land. In other words, to work with the naturally available feed that is available on their land.**

We are using too much land for animal feed, land that could be used directly to produce crops for human consumption. If, instead of using so much land to grow crops for animals to eat, we used these crops to feed humans and prioritised 'low opportunity cost' animal feed sources (e.g. primarily grass, food industry, insect feeds and agricultural by-products and food waste) that do not compete with human nutrition, millions of hectares of arable land could be released for other purposes across the UK. It could have a transformational impact on the food available to humans and space available for nature. By reducing the intense pressure on cropland to produce high yields across Wales, land use could be transformed to enable nature to thrive alongside food production in a circular and resource efficient future. Livestock can be - and already are in some cases - fed without competing with direct human nutrition at all.

The use of **insects** in our feed chains has huge potential in helping the transition to a circular economy. In particular, their ability to convert surplus food (which would otherwise be waste) into high quality protein to replace soymeal and fishmeal in animal feed. In the UK / Wales we are yet to see this technology being

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scaled up. There is a huge opportunity for the Welsh Government to promote research and on farm support because currently it is hard to get farmers / primary producers to try out new technology without any support or financial guarantee. Existing UK legislation is placing a stranglehold on insect farming, restricting what materials insects can be reared from and preventing insect meal from being used in pig and poultry feed. The Welsh Government should lobby the UK Government to amend legislation in line with EU legislation. This would allow us to scale up massively producing meaningful levels of protein at a much cheaper price, as well as incorporating a meaningful amount of waste. There is an opportunity for Wales to be a leader in this field, with so many poultry farmers on family farms, it could prove pivotal towards the success of our rural economy. The EU in 2022, introduced new legislation enabling the use of insect meal and other processed animal proteins (PAP). For more info see

<https://www.michelmores.com/agriculture-insight/insect-protein-animal-feed/> We believe the Committee should continue to scrutinise measures and policies in relation to river pollution in years 3-5. This is important for many reasons. For example, current modelling suggests that 60-70% of the total phosphate load in the River Wye now comes from agriculture. (P7: [https://councillors.herefordshire.gov.uk/documents/s50101856/RePhoKUs\\_Wye\\_Report\\_310522.pdf](https://councillors.herefordshire.gov.uk/documents/s50101856/RePhoKUs_Wye_Report_310522.pdf))

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#### **4. To what extent are the Committee's detailed priorities/outline programme of work still relevant, reflecting on social, economic and environmental developments since they were set at the start of the Sixth Senedd?**

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It is essential that there is cross committee collaboration in order to tackle the climate crisis and Wales' global ecological footprint - we need to work across sectors such as food, farming and procurement. This needs joined up working and thinking.

As above.

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#### **5. Are there any other matters related to the Committee's priorities/work programme/ways of working that you would like to comment on?**

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No response.

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#### **6. Other information**

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No response.

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