
Senedd Cymru | Welsh Parliament

[Y Pwyllgor Cydraddoldeb a Chyfiawnder Cymdeithasol](#) | [Equality and Social Justice Committee](#)

Ymateb gan: Maint Cymru | Evidence from: Size of Wales

Consultation response Size of Wales

Well-being of Future Generations (Wales) Act 2015: Post-legislative scrutiny

Size of Wales is a Welsh climate change charity that helps protect tropical forests and inspires climate action here in Wales. Our response to this consultation has focussed on the global responsibility goal of the Act, given that that is our area of expertise.

1. How far the intended objective of the Act is being achieved;

The Act has promoted longer term thinking and an integral approach to tackling structural issues. The Act reflects the long-term thinking of Indigenous Peoples who also promote an inextricable relationship and responsibility as an interdependent part of nature.

Progress made:

(i) Increased Awareness & Integration

- The Act has helped public bodies recognise global interdependence—especially regarding climate change, fair trade, and global inequality. Local authorities and the Welsh Government increasingly refer to global responsibility in strategies (e.g., Climate Action Plans, international solidarity efforts).

(ii) Ethical Procurement

- Some councils and public bodies have adopted ethical and sustainable procurement practices, including support for Fair Trade Wales and ethical sourcing policies.
- The Act enables Public Bodies to be bold and implement innovative actions to tackle systematic challenges. For example, Monmouthshire County Council voted to become the first Deforestation Free Champion Council in Wales (and possibly

the world!).

(iii) Global Citizenship Education

- Organisations such as Size of Wales, WCIA and Dolen Cymru have promoted global citizenship in schools, with increasing emphasis post-Act.
- Education reforms include a curriculum for Wales that embeds sustainability and global citizenship.

(iv) Collaboration

- The five ways of working of the Act increases collaboration between different actors.

(iv) Global leaders

- It has positioned Wales as a global leader in sustainability governance, drawing international interest and partnerships, boosting soft power and reputation.

Challenges

Lack of Clarity and Metrics

- The definition of "Globally Responsible Wales" remains vague and hard to measure. It is hard to quantify the benefits due to a lack of robust, long-term impact data—especially for cross-cutting goals like "Globally Responsible Wales."
- Current national indicators focus mainly on domestic outcomes (e.g., emissions), not the global footprint (e.g., imported goods, supply chains).
- Not seeing a fundamental shift in the ways public bodies and the Welsh Government are working to deliver the Act. There is an implementation gap between the goals and indicators of the Act and action on the ground.
- Some public bodies struggle with applying the Act meaningfully. If the Act is seen as a "tick-box" exercise, it doesn't generate real returns.
- There is a weakness within the Government of cross departmental / thematic thinking to put into practice the ways of working and seven wellbeing goals.
- There are some goals that have made more progress than others. The Global Responsibility goal is one of least understood and least actioned goals, given its breath and broadness.
- Auditor General reports have flagged inconsistency in how well different sectors apply future-thinking.

Weak Accountability

- Without clear sanctions for non-compliance, public bodies may underperform without consequence.

Limited International Impact Assessment

- Public bodies rarely assess how their policies affect global communities (e.g., climate justice, trade relationships, development aid).
- Wales still contributes significantly to global ecological degradation through consumption patterns (e.g., imported deforestation, outsourced emissions). See the JNCC report commissioned by the Welsh Government.
<https://data.jncc.gov.uk/data/dc81dd16-9b1c-4eeb-b350-dcadd5ade736/jncc-report-743.pdf>

Insufficient Structural Power

- The Future Generations Commissioner lacks binding powers to enforce globally responsible practices.
- Some public bodies treat the global goal as less urgent than domestic goals like health or economic resilience.

Overreliance on Soft Power

- Most progress is voluntary or symbolic, not embedded through law or budgeting.
- No mandatory requirements exist for public bodies to align spending with international ethical standards.

One practical example is the theme of global deforestation.

- 73% of all tropical deforestation is linked to just five agricultural products: beef, soy, palm oil, coffee, and cacao.
- To provide Wales' annual imports of key commodities like cocoa, palm oil, beef, soy, and timber, we require a land area in the tropics equivalent to 40% the size of Wales. 30% of these imports come from countries rated as high or very high-risk for deforestation, ecosystem destruction, and human rights violations - including child labour and the abuse of Indigenous Peoples' rights.
- 78% of soy imported into Wales is used as feed for livestock, along with 50% of our palm imports.
- The greenhouse gas emissions from just four of these commodities - soy, palm oil, cacao, and rubber - are equivalent to 22% of Wales' total transport emissions.
- If everyone on Earth lived like the average person in Wales, we would need 2.08 planets to sustain our lifestyle.

As part of the globally responsible goal, Wales should be ensuring that our supply chains are fair, ethical and sustainable. Size of Wales have been working with pupils from over 30 schools in Wales to become Deforestation Free Champion schools and they have carried out audits of their school menus to check whether there are ingredients on their school menus that might be contributing to tropical deforestation overseas. Their audits have found that schools and councils are serving non fairtrade products, including ingredients with palm oil in including ultra processed food, serving

meat and dairy fed on soy feed, and meat including corned beef that has been imported from high-risk countries such as Brazil.

Public procurement in Wales should be adopting deforestation free procurement principles that are globally responsible. Global justice, climate equity, and ethical sourcing need much stronger focus.

In short, while the Act has *inspired a cultural shift* and placed Wales on the map as a sustainability leader, the Globally Responsible Wales goal is only partially achieved, with major gaps in impact measurement, supply chain ethics, and international accountability.

2. Any action which should be taken to improve the effectiveness of the Act and its implementation, including any specific drafting issues;

We have the following recommendations:

Ethical Procurement and Supply Chains

- Require public bodies to adopt ethical sourcing, fair trade, and deforestation free standards.

Global Education and Solidarity Programmes

- Increase funding and visibility of global citizenship education in schools and communities.
- Strengthen partnerships with Global South countries through such as Wales and Africa.

Climate and Ecological Justice

- Accelerate decarbonisation efforts with a just transition model that supports affected workers.
- Create carbon accountability for Wales's global ecological footprint, not just domestic emissions.

Governance and Institutional Reform

- Bolster the powers of the Future Generations Commissioner, including budget oversight and veto powers. Equip the Commissioner with stronger powers to challenge poor performance
- Create a Parliamentary Committee for Future Generations to scrutinise legislation from a long-term perspective.

- There needs to be greater alignment between the goals, objectives and National Indicators of the Act with Public Bodies implementation plans. There seems to be a disconnect between high level indicators and on the ground implementation.

Strengthen capacity

- Investment in capacity of public bodies (PBs) to implement the wellbeing goals, given the cuts in public funding.
- More support provided to PBs to have a better understanding of how to implement the globally responsible goal and sharing of best practice from within Wales and with other nations / countries that are promoting innovative work.
- Greater involvement of third sector organisations and the public especially young people to be involved in implementing the Act and ensuring accountability.
- For example, we are not aware of how the Welsh Government plans to ensure that the “Emissions of greenhouse gases attributed to the consumption of global goods and services in Wales” is reduced. Despite commissioning the [JNCC report](#) on Wales’ global ecological footprint and Welsh consumption, there are no recommendations or action plans included in the report or targets to reduce this footprint. There also needs to be links to the National Indicators and PBs plans.
- Introduce auditable standards for reporting (KPIs, benchmarking)
- Make funding or recognition contingent on compliance

3. Would you like help drafting a compliance improvement framework or a report quality checklist for public bodies under the Act?

4. Whether the review and reporting requirements under the Act are being met;

The review and reporting requirements under the Well-being of Future Generations (Wales) Act 2015 are partially being met, but there are concerns around their consistency, depth, and impact across public bodies.

(i) The Future Trends Reports (2017, 2021) have been published.

- However, the report could be used more in policymaking and integrated into budgeting or programme implementation.

(ii) Public Bodies reporting

- Partially met. Most public bodies do report annually, but the quality and depth vary widely. Some reports lack clear metrics or fail to demonstrate impact or progress.

(iii) Public Services Boards (PSBs)

- Met on paper, but the Well-being Assessments and Plans are often vague or overly broad.
- Annual reports tend to be descriptive rather than evaluative—highlighting activities rather than outcomes.

5. How far the Act has represented, and will continue to represent, value for money.

To implement the Act, funding is required to run the Office of the Future Generations Commissioner for Wales, train public bodies on how to implement the act in practice and adjust policies etc. These costs represent value for money for the impact achieved.

The Act can also enable long-term cost avoidance. It encourages preventive action, especially in health, climate change, and education. These help avoid future crisis costs. E.g., policies promoting active travel and healthy lifestyles help reduce long-term NHS burden. Sometimes the Act promotes integrated working among public services, which reduces duplication and siloed spending.

Compared to traditional government spending, which often targets short-term outputs, the Act promotes systemic, long-term change. While returns may take decades, they are:

- Preventive, rather than reactive
- Societally broad, not limited to specific sectors
- Intergenerational, potentially benefitting future Welsh generations beyond current budget cycles.

6. How far the Act has been legally binding and enforceable; and

The *Well-being of Future Generations (Wales) Act 2015* is legally binding in principle, but not strongly enforceable in practice. While it places statutory duties on public bodies, the lack of hard enforcement mechanisms—such as legal penalties or judicial oversight—has significantly limited its power.

- It lacks legal teeth.
- Courts have limited precedent to enforce compliance under the Act.
- No successful legal action has yet forced compliance.
- The Commissioner has no enforcement powers. They may offer guidance, reviews, and make recommendations—but cannot compel action.
- Public bodies can legally ignore advice without consequence.



For further information, please contact
Barbara Davies-Quy
Deputy Director
[REDACTED]