



## Response to Food (Wales) Bill January 2023

[Social Farms & Gardens](#) is a UK wide charity supporting communities to farm, garden and grow together. We represent over 300 community gardens, farms, orchards, allotments and other growing spaces across Wales. We operate the WG-funded [Community Land Advisory Service](#) as well as leading two large RDP funded partnerships: [Resilient Green Spaces](#) is taking a whole food system approach to pilot alternative localised food systems using communities and their green spaces as a driving force for change; and [Sustainable Procurement Food Hubs for Local Prosperity](#) is demonstrating the small-scale agroecological producers can supply the public sector.

We support the general principles of the Food (Wales) Bill and the need for legislation to deliver a more sustainable food system for Wales. Working at a grassroots level across Wales, we see how integral food is to all parts of all of our lives – health, economic wellbeing, our environment, plus social and cultural connections. Therefore, providing a framework that recognises the cross-sector nature of food and reflects this in a cross-government Commission with the legislative power to influence “on-the-ground” action, is essential.

The use of primary and secondary food goals is commended. The stated Primary Food Goal shows that food impacts on many areas of legislation and policy. It is hard to argue that, as a nation, we should not be aiming for this Goal, with or without legislative mechanisms. Yet, when the various areas are considered separately, without the joined-up consideration that would be provided by a Food Commission, we see decisions being made that meet just one or two of these priority areas. For example, intensive poultry farming units may currently be approved on the basis of their positive impact on our economic production and affordable food, but they do not deliver environmentally or socially sustainable food for the people of Wales. Legislation is required to deliver on the full stated policy intention.

We would advocate the use of minimum food targets to allow progressive local areas to act as exemplars to other areas who are further behind on their journey. The Food Commission should be resourced to facilitate communities of practice that allow consultation between areas and with all food system actors including primary producers, processors, manufacturers, hospitality, public sector and community initiatives. Existing cross-sector Sustainable Food Partnerships across Wales have recently been supported with £2.5m funding from WG’s Prosperous Futures Team.

There is currently a disconnect between what is happening locally and what is happening nationally with regards to vision and strategy for food. Enlightened local areas are already developing Local Food Plans as they can see the benefit of taking a cross-sector approach to food, and understanding the implications of decisions that affect the food system will have on different departmental budgets. For example, illnesses associated with obesity is projected to cost the Welsh NHS more than £465 million per year by 2050, with a cost to society and the economy of £2.4 billion (PHW). A coordinated approach across Wales will be encouraged by creating a framework within which these local plans can align with a holistic food system strategy for a **sustainably** prosperous Wales.

Ongoing consultation with food systems actors, and the use of existing good practice and Food Partnerships will be necessary to help mitigate barriers to implementation and avoid unintended consequences, as well as limiting the financial implications of the Bill. Strong leadership through a single Food Commissioner would help to direct and control this process. There is already a lot of good will, and activity, aiming to establish a more sustainable food system in Wales, but it is often fighting the existing priorities of different strategies and policies. The Food (Wales) Bill provides the framework that will act as the catalyst needed to bring food to the forefront and offer the legislative backing to take action through our food system (which we know is integral to areas of all our lives) that will have a positive impact on health, educational attainment, social cohesion, economic development and environmental restoration.

We recognise that other Bills, including Agriculture and Social Partnerships & Procurement, accommodate (or could accommodate) some of the Food Bill's proposals. However, this would perpetuate the current issues of miscommunication, overlap and disconnect between policies that affect, and are affected by, food. We contend that the Primary and Secondary Food Goals are not in dispute as being worthwhile aims, but it is only through whole system legislation that Wales will be able to take progressive and cohesive action on these Goals and become a nation that leads in sustainable food systems.

### **Community Food Growing**

Although details of the Community Food Strategy are yet to be shared, the Rural Affairs Minister said in March 2022 that some of the aspects of the Food Bill will be incorporated into it.

In June 2022 the Minister's paper to the Senedd's Economy, Trade and Rural Affairs Committee's Cost of Living Inquiry shed some light on what the strategy may and may not do:

*"Welsh Government policy is to develop local networks and supply chain clusters where doing so is sustainable in the long term. We are already doing this with food manufacturers. The Community Food Strategy is an opportunity to further this work and facilitate grass roots activity also. There is evident interest and energy in communities about food related projects with myriad initiatives throughout Wales. Often the benefits are things other than the produce itself, and could contribute to a range of Future Generation Well-being goals. The government's intention is to assist these initiatives and we have been engaged in Food (Wales) Bill: Explanatory Memorandum 9 extensive one to one conversations with organisations active in this space to understand challenges and opportunities. It is conceivable public bodies might focus more on some of the structural barriers which exist for community projects such as availability of land, or they might consider how local suppliers can meet their procurement needs..."*

Furthermore, the Bill explanatory memorandum states -

*The scope of the Community Food Strategy as described above seems to be consistent with the objectives of this Food Bill. However, the strategy is not a substitute for the broader aims of the Food Bill in achieving an overarching framework for promoting a holistic and sustainable food system in Wales.*

Yet Welsh food exports increased by 16% between 2021 and 2022, the highest of the 4 UK nations. While this may be seen good economically, it means that we are importing even more. The fragility of our food system was [highlighted during the Pandemic](#) and then again following Russia's invasion of Ukraine. Global events like this show that we need a local and more sustainable food system and one that relies on local food suppliers.

We argue [Community Supported Agriculture](#) and other forms of community food production have an important role to play in providing local food supply chains. [Cae Tan](#) CSA Farm on the Gower is a fine example of this, feeding over 100 families a week with fruit and vegetables. The network of CSAs across Wales is growing at a fast rate. The Bill Explanatory Memorandum says the Bill *will establish the overarching framework to ensure farming and supply chain policy is considered alongside other important aspects such as public health and tackling food poverty*. Community Supported Agriculture needs to be highlighted as an important farming model that will help achieve this.

Controlled Environment Agriculture is highlighted in the Bill explanatory memorandum as a potential solution. We would argue that CSA is a much stronger alternative as it is largely based on the principles of agroecology and is a much more sustainable, resilient solution working with nature (food sovereignty) and climate change, and not draining our precious energy supplies. CEA may have its merits but its reliance on temperature control means large scale roll out is not sensible given our climate change and energy supply emergencies.

Public bodies must be encouraged to provide supportive processes and policy for community supported ventures. The current state of play for new small scale farming ventures is a stifling one. Barriers range from unsupportive planning legislation and policy to a lack of funding options. There is a culture amongst many (not all) public bodies that start-up community led food projects and enterprises are too risky and not worthy of investment and resources. Supportive legalisation and policy at a national level is much needed to combat that culture and drive change in the right direction.

We would like to add in our concern over the question of 'what if the Bill is not supported?'. For too long now food policy has been fragmented and disjointed and at times in competition with other priorities. The Bill looks to address this, and if it is not supported we will be forced to continue working in a siloed mentality around our food system. We know through our strong connections in Scotland there can and will be challenges if passed but we are also absolutely seeing that positive change can come from such ambition. Wales could lead the UK on food policy development, but if it is not supported we will be no better off than they currently are in England with their lack of support for taking action on the more challenging demands of their National Food Strategy.

Thank you for taking the time to consider our response.

**Social Farms & Gardens**  
**January 2023**