

Consultation on Wales Food Bill

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I am responding to the consultation on the Food (Wales) Bill as I am an academic who actively researches food and drink SMEs in Wales. Consequently, my interest in this consultation is from the perspective of food and drink businesses. The responses hereafter are structured around the information provided on the consultation.

The general principles of the Food (Wales) Bill and the need for legislation to deliver the stated policy intention.

The general principles of the Food (Wales) Bill are good, with clear goals and targets and a clear structure that supports this. The need for legislation here may be a matter for some debate, however, given the many challenges that the food and drink sector faces in Wales at present, the introduction of legislation in this way could be beneficial in supporting the sector through the many challenges and ensure that a more strategic approach is taken towards the sector. Such challenges include the impacts of post-Brexit changes to the food and farming sector, changing levels of standards towards food and farming, and the impacts of climate change. Considering these challenges, and the lessons learned from the difficulties of the Covid-19 period, there is a need for strategies for the food sector to consider greater resilience, such as how the sector can adapt to such periods of difficulty, which are becoming more frequent and more pronounced. The influence of the Wellbeing of Future Generations Act can be beneficial in this case in ensuring that decision-making adopts strategies that focus on resilience, community cohesion, prosperity, health, the importance of the Welsh language to the sector, equality and global responsibility.

- **Food goals and targets**

The primary food goal of the provision of affordable, healthy, and economically, environmentally, and socially sustainable food for the people of Wales is of considerable significance, and align well with the Wellbeing of Future Generations Act. Under the current economic conditions, access to affordable and healthy food is vitally important for people across Wales, not only in ensuring short term provision, but also in leading to longer term benefits to health and wellbeing of people and society. The emphasis here on economically, environmentally and socially sustainable food is also important from the perspective of the food and drink sector in ensuring the long-term success of the sector, which is hugely important to communities across Wales, and the economy as a whole. There is a need to

promote innovative sustainable practice due to climate emergency challenges, which can involve a consideration of leveraging local resources and closer cooperation between local stakeholders across Welsh communities.

The secondary food goals are important in reinforcing the primary goal by emphasising the wellbeing aspects discussed above, as well as promoting important food issues through education, skills development and encouraging a reduction in food waste.

- **Welsh Food Commission**

The way the food strategy in Wales is managed is important, however whether this is done through a new commission, or an existing entity, is not a matter that concerns me. I welcome the purpose of a Welsh Food Commission, as this would provide a platform for overseeing the food goals and targets, and the national food strategy. It is important that this body is representative of the food and drink sector and works towards the goals and targets that have been established.

- **National food strategy**

A strategy for the food and drink industry is essential, especially considering the challenges that the industry faces in Wales at present. It is hoped that a new strategy would take into consideration the specificities of the sector in Wales, the values, resources and capabilities that exist across Wales. It should also align with overall aims of the Welsh Government with regard to climate emergency challenges and the Wellbeing of Future Generations Act.

- **Local food plans**

A focus on local areas and localised food networks is important for the food and drink sector. From my research I have observed excellent examples of food businesses working collaboratively to share resources and add value to the business. This is important for small businesses in bringing opportunities, but is also indicative of the ways in which small businesses place trust in people that they know locally, and this is often part of a stronger relationship than with stakeholders on a regional or national scale. My research has looked at the value of entrepreneurial ecosystems, and how local stakeholders come together to work collaboratively for economic benefit to all. The Wellbeing of Future Generations Act is important in this respect, and having strong local food networks could bring greater resilience among food and drink SMEs. Given the geography of Wales and the small nature of some food producers, there is value in local networks, and there have been several excellent examples of small producers who have grown significantly to sell in international markets. In light of this, there is a need to look at local food networks and integrate these into a wider food strategy for Wales. Considering the many challenges that the industry faces at present, there is value in promoting local food networks in ensuring that local producers can supply local businesses and public services, ensuring that food miles are reduced, and that supply chains can be simplified to ensure that people in the local area can get access to healthy and affordable food. I believe that this is essential in ensuring that the food goals outlined in this bill can be achieved. For the overall national food strategy, it is important to consider how these local food networks can be joined into a national network.

- **General matters including meaning of terms, regulations, interpretation, and commencement.**

No specific comments on this matter.

Any potential barriers to the implementation of the Bill's provisions and whether the Bill takes account of them.

I believe that the aims of the bill need to ensure that they are inclusive of all relevant stakeholders across the food and drink supply chain, and covering all geographic areas of Wales. It is important in the current social and economic climate that stakeholders concerns are listened to, as they are aware of the challenges that they face, and what support is needed to overcome these. It is hoped that the bill would aim to create a clear structure that can support the food and drink sector in Wales and not create additional layers of governance or introduce more complicated ways of operating.

I do have concerns with post-Brexit changes that are occurring through UK Government legislation, which could have a significant impact on the food and drink industry across the UK, therefore it is hoped that having a clear strategy for Wales, and a bill that covers Welsh food and drink, would provide Wales with a clearer pathway. My main concerns relate to a reduction in food standards, which is something that the European Union was known for, as reducing standards would have an impact on Wales' reputation for quality food and drink produce, and could have an impact on internationalisation of Welsh produce. I believe that it is important to maintain extremely high standards in food and drink produce in Wales, which has been part of previous food and drink strategies in Wales, such as through obtaining protected geographical indication for various Welsh foods.

The appropriateness of the powers in the Bill for Welsh Ministers to make subordinate legislation (as set out in Chapter 6 of Part 1 of the Explanatory Memorandum)

No specific comments on this matter.

Whether there are any unintended consequences arising from the Bill.

No specific comments on this matter.

The financial implications of the Bill (as set out in Part 2 of the Explanatory Memorandum).

No specific comments on this matter.