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Elin Jones AM
Minister for Rural Affairs
Welsh Assembly Government
5th Floor
Ty Hywel
Cardiff Bay
CF99 1NA

Dear Elin,

Food Consultation

- **The Sustainable Development Commission welcomes the development of a food strategy for Wales**
- **Rising food costs and food inequalities can only be effectively tackled using a sustainable integrated approach to local food**
- **Evidence and research on food policy need to be widely debated and inform the future direction for implementation of this strategy to be effective**
- **We have a strong food offering in Wales that needs to be championed on the international stage**

This letter sets out key recommendations made by the Sustainable Development Commission in response to the consultation on the Food Strategy for Wales. These recommendations are drawn from our expert Commissioners and secretariat, and contributors to our recent roundtable on sustainable food.

Food has a crucial role in delivering a better quality of life within environmental limits for the people of Wales, and that an integrated, sustainable approach to food is a practical solution to the social, environmental and economic challenges Wales faces. The Sustainable Development Commission commends the Welsh Assembly Government for developing a future food strategy, and strongly urges the present and future governments in Wales to do all they can to deliver this strategy.

Questions 1 & 2 – The Vision

Food is a cross-cutting issue that affects all areas of government policy; it is therefore critical to have a strong vision which reflects this level of influence. Delivering the vision relies on an equally strong implementation plan, which the consultation document does not yet set out. The Sustainable Development Commission strongly recommends ensuring that the vision is shared by key stakeholders from farming and food business sectors, civil society organisations and policy makers at local and national level and that respective roles and timeframes to deliver are clear.



The Vision is ambitious in its reach, and the ten year span will require investment now to be achieved. It will be important as the effects of rising commodity prices and climate change are felt more widely that the vision is updated to reflect these issues.

It is also important that the resulting strategy is sufficiently widely supported to continue in future Welsh governments. Food influences so many policy areas that it risks falling between portfolios, and it is essential that this is avoided.

We have identified some gaps in the draft vision. The vision does not include the importance of food grown directly by people at home and on local allotments. While this is currently a small part of the food market, it is emerging in 2010 as a growing area of food production, and can only be expected to grow towards 2020 as food prices will increase. It plays a potentially important role in encouraging people to think more about their food choices, where food comes from and to consider broader sustainability issues. It will therefore be important for government and the food industry to work alongside this growing source of food production, as well as the importance of driving recognition of Welsh food and drink brands on the international stage. Support must be given to food producers and manufacturers to embrace sustainability, in order to be globally recognised leaders in the production of high quality and sustainable food.

The Vision also needs to take account of issues of food poverty and inequality that exist already in 2010, to ensure fair and affordable access to healthy food for all. The negative health impacts, including diet-related ill health, of such inequalities are well documented¹. Wales already has higher than UK average rates of obesity, risking long term high health costs. Given the current economic climate and evidence of rapidly rising food prices, this needs to be a priority for the Welsh government to avoid the risk of poor social outcomes, including possible social breakdown, and obesity rates should be considered as a key performance indicator of achieving sustainable diets.

Question 3 – The Wider Agenda

Food has the potential to influence key areas of government action, and have a positive impact on the indicators of sustainable development. Individual wellbeing and social justice are widely recognised as being strongly affected by food choices². Care must be taken when including food within economic policy that a focus on growth does not undermine wider sustainability objectives. In particular, given that food is not a sector under the Economic Renewal Programme for DE&T, it is important that companies operating in the food manufacturing and processing sector in Wales, including many well known brands, are given sufficient support to operate profitably and sustainably.

The Sustainable Development Commission would recommend that the work on developing indicators of a sustainable food system as part of the Food 2030 policy³ is replicated in a relevant form in Wales, so that the impacts of food policy on other areas can carefully monitored, and the impact of food on a sustainable future can be celebrated.

Question 6 – the Delivery Mechanism

The consultation document, whilst clear on its future vision, is less clear about how to get there. Effective implementation plans will be critical to help all stakeholders begin their journey towards a sustainable food system,

¹ Sustainable Development Commission, 2010. *Sustainable Development: The Key to Tackling Health Inequalities*. (<http://www.sd-commission.org.uk/publications.php?id=1053>)

² New Economics Foundation, 2010. *An Inconvenient Sandwich*. (<http://www.neweconomics.org/publications/inconvenient-sandwich>)

³ DEFRA 2010. *Food 2030*. (<http://www.defra.gov.uk/foodfarm/food/pdf/food2030strategy.pdf>)



and we are concerned that the knowledge developed in reaching the vision will not be usefully shared and updated without a clearer plan on how to progress. The Sustainable Development Commission would urge the early development and publication of sustainability roadmaps to aid all stakeholders in achieving sustainable delivery.⁴

The Sustainable Development Commission believes that an effective national council on food policy and research will be essential to debate emerging evidence and research on food matters, and report findings directly to government. A group of this nature would need to be reflective of expert opinion from stakeholders across the wider food sector, and be open and accountable in its operation. This could be an enhancement of the role of the existing Food and Drink Advisory Partnership, to include a greater emphasis on emerging science and research findings. The value of the council would be its ability to present expert ideas and reasoned arguments with a strong evidence base directly to government.

The effective implementation of the vision relies on the Welsh Assembly Government bringing all parts of food industry together effectively, from agricultural research capability, to sustainable food producers and well informed consumers. A strong council able to inform policy choices through its evidence base would be an asset to this mechanism.

Question 8 – Sustainability

Sustainable Development is the Central Organising Principle of the Welsh Assembly Government, and therefore is unquestionably at the heart of all policymaking on food.

The approach to sustainability in the draft strategy focuses on economic, environmental and social aspects. Critically missing from this are the principles of good governance, and the responsible use of sound science that are set out in the UK Framework on Sustainable Development⁵. The Sustainable Development Commission would recommend that the post-consultation version of the strategy incorporates a clear understanding of, and commitment to these aspects of sustainable development.

The wider food sector needs the leadership and support of the Welsh Assembly Government to deliver sustainability in their actions. The policy needs to both set a clear direction towards a sustainable future, and give the industry and consumers the knowledge and tools they need to deliver sustainability.

Questions 10 & 13 – The role of food and future policy making

Food has a wide sphere of influence on other government policies, but cannot by itself deliver transformation in the areas listed in question 10. It is important that government policies support the development of the food strategy, just as the food strategy helps to deliver other objectives.

Sustainable Development can be best delivered by government and the industry having a clear understanding of the links and mechanisms between these policy areas, and the roles each are expected to take in delivery. An important task would be to map out all of the stakeholders involved in the food industry and their means and methods of interaction, as was done when developing the Waste strategy. It is vital that this seeks to identify those suppliers in the whole food production chain who are often invisible to end consumers, to aid in identifying where the most effective interventions in policy and regulation can be made.

⁴ Sustainable Development Commission (2007) *You Are What You Sell*. (<http://www.sd-commission.org.uk/publications.php?id=624>)

⁵ DEFRA, 2005. *One Future, Different Paths – The UK's Shared Framework for Sustainable Development*. (<http://www.defra.gov.uk/sustainable/government/documents/SDFramework.pdf>)



Effective co-operation between all of the partners involved will be critical to the success of the strategy, recognising that the long term future of Wales depends on responsible action by all involved. This can be partly consumer and market led but it is important to recognise the limitations of a market approach and the important role for government, and business to drive and incentivise change. For example changes driven nationally by regulation and enforcement, by standard setting (for example public sector food procurement standards, school meals standards), by choice editing and by pricing incentives can all make an important difference. There is an important role here for an integrated behaviour change strategy to enable people to choose more sustainable diets. The Sustainable Development Commission's work in this area⁶ provides further evidence for a Welsh strategy to build on.

The Sustainable Development Commission are concerned that fundamental questions to Wales' future food capabilities are not addressed within the strategy, including the approach to soil fertility, how to tackle high meat and dairy consumption as part of a sustainable diet, how to promote Welsh horticulture, and how to tackle issues of cost for home-grown produce such as cereals. Positioning this strategy at the heart of government policy making is essential for a sustainable future, yet the links between it and policies such as the Natural Environment Framework, Economic Renewal Programme, the Sustainability Committee's Allotments inquiry, the Local Food Action Plan, and emerging policy such as Tourism Green Stars are not well developed.

Concluding Notes

There are a few examples worldwide of a successful step change in food production and consumption that are truly sustainable, but with this clear vision of the future the Welsh Assembly Government is positioning itself well to achieve this.

It is vital that the importance of the strategy is seen by politicians across all parties, is supported and developed into the future, and is not left solely to the existing markets to deliver.

As with all strategies however, the extent to which it will be effective at building sustainability, security and resilience is dependent on implementation which puts sustainable development at its core, and does not reward short term profit over the future prosperity and wellbeing of Wales and its people.

Yours sincerely,

Peter Davies
Commissioner for Wales, Sustainable Development Commission

⁶ Sustainable Development Commission, 2009. *Setting the Table: Advice to Government on priority elements of sustainable diets.* (<http://www.sd-commission.org.uk/publications.php?id=1033>)

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