

Rethinking Food in Wales / Ailfeddwl am weed yng Nghymru

Submission of Evidence to the

Climate Change, Environment and Rural Affairs Committee

by

Directors of Public Protection Wales

Introduction:

The Directors of Public Protection Wales (DPPW) represent a range of local authority services, including Environmental Health, Trading Standards and Licensing which collectively are often referred to as Public Protection services.

Public Protection services are responsible for applying a wide range of legislation required to protect consumer rights and protect public health. These services directly affect the health, safety and wellbeing of our communities in Wales and its visitors.

We welcome this opportunity to contribute to a vision for the future of food in Wales and would be pleased to provide further written or oral evidence to inform any inquiry.

The role of Food Authorities.

Local authorities in Wales have a vital and significant role in supporting our food and agriculture industry. As Food Authorities, they have responsibility for regulating nearly 34,000 food businesses across Wales a large proportion of which are visited each year by colleagues carrying out food safety and standards inspections, audits, sampling and advisory visits as part of their food law enforcement responsibilities. This work has close links with other local government services that together play a significant role in supporting wider business and economic development.

Having such a significant footfall at and understanding of Welsh food businesses gives our professional colleagues a uniquely valuable opportunity to contribute to the development and success of the Welsh food industry. They see food business succeed and fail every day and have a good understanding of why.

A vision for food in Wales and what needs to be done to achieve it

The first recommendation that we would wish to make is that the aims must include clear reference to standards of food safety and provenance. Any vision for the future of food in Wales cannot be an appropriate one without giving food safety and standards significant recognition. This is notably absent in the aims currently set out in the call for evidence. The reasons for this are set out below.

We were disappointed that food safety and standards were not more strongly featured in *Food for Wales, Food from Wales 2010-2020 Food Strategy for Wales*.

The importance of food safety

Food safety is vital to public health, consumer confidence and business success. We need to know that food is safe and is what it says it is. We have a good record of food safety regulation in Wales with compliance levels improving year on year but we know, sadly, things can go wrong. The 2005 E Coli 0157 outbreak brought huge public awareness that food safety failure can have tragic consequences. We know also, from incidents like the horsemeat scandal, that we need ongoing vigilance in relation to food. It also emphasised that large businesses are as likely to fall victim to failures in the food chain as anyone else.

The recent tragedy at Grenfell has underlined the need to ensure that public protection is not prejudiced by reducing standards, cutting corners or removing independent regulation where public safety demands it.

We also know the impact of reputational damage to the food industry. Huge financial damage that can be done to a business if food safety failings cause the public, or others with whom they trade, to lose confidence in it. Furthermore, such failures can harm a whole country's reputation as a food producer with subsequent economic damage to trade. First and foremost, we need to make sure our food is safe to eat.

Regrettably there are continuing food scares and proper structures and processes are needed more than ever to help prevent such food problems.

These are some of the reasons why we are recommending that Wales maintains a strong and independent system of food regulation.

A growing need because of Brexit.

Brexit means that we will need, more than ever, to be able demonstrate to other countries with whom we wish to trade that Wales has high standards of food safety and provenance underpinned by a robust, independently regulated system. Being able to give others the confidence they need will be vital to the success of our food businesses and their future growth. This is why we believe that high standards of food safety underpinned by a robust, independent inspection system will give Welsh businesses a distinct edge in terms of international trade, tourism and our home market.

But we can do more to help them. Whilst local authorities provide as much assistance as they can, the current approach doesn't help. We need to do more to help food businesses that are seeking to establish or grow. We need an approach that helps food businesses get it right from the start, keep set-up costs down by spending wisely during the start-up period, help them understand and meet their responsibilities from day one and build their reputation effectively - including getting it right to achieve a high rating under the mandatory Food Hygiene Rating Scheme.

We know that the public expects that a food business has already demonstrated that it meets minimum standards before it begins to sell food. But this is not the case. We need to remedy this and improve further by putting in place a system of prior

approval that provides the confidence consumers (and others with which a business will trade) will expect. For these reasons, we are recommending a licensing system in Wales - to provide a much-improved package of support to businesses, better public protection and greater consumer confidence.

The wider context of our delivery system and joined up policy

It is vital that our approach to food regulation is taken forward in the wider context of Wales' devolution journey, the wider public policy context and the wider public health delivery system in Wales. We need to structure our system around an approach that is right for Wales.

We believe it is important that a vision for the future of food in Wales is a joined up one. We are keen that decisions about food and food safety are considered in the context of other Welsh policy matters, including: other public health issues (such as nutrition and obesity) economic development, farming, animal health and welfare, tourism, etc. The existing and potential role of local authorities in Wales in these areas is clear. But doing that demands that decisions are taken in a Wales context because these delivery mechanisms, public policies and priorities and public service delivery arrangements are different in Wales to England. That is why we are recommending that national policy decisions regarding food law delivery are made in Wales, by a Welsh body.

The integrity of the food chain from “farm to fork”.

We are recommending taking a whole system approach from “farm to fork” so that consumers can trust that food is what it claims to be. Food fraud and criminal behaviour that targets the human food chain can undermine the integrity of food that is produced in or originates from Wales. Consumers must have faith that the food they consume is what it claims to be. Consumers and businesses do not want to be duped into purchasing fraudulent products such as cheap horse meat labelled as beef and, importantly, do not want unfit and harmful foods entering the food chain. Good businesses do not want their reputations damaged by unscrupulous traders. Integrated, effective, independent regulation is vital to safeguard consumers, good businesses and the economy of Wales. It provides a level and fair playing field for all businesses.

Local authorities play important roles, quite possibly unique roles, in animal welfare, animal health - including overseeing animal movement controls, that sit alongside other public protection and wider local authority services. An integrated approach is important to protect the food chain and its reputation and to deliver a joined up, efficient interaction with businesses - including the farming community.

Working together

We believe that effective delivery is founded on effective partnership and collaboration – characteristics that Welsh Government promote and we wholeheartedly support. Effective liaison, joint working and at times co-production are important in delivering effective, efficient, relevant and joined up policies and services. There are policies and plans that will benefit from the input of key partners and from developing these together.

One key partner ought to be the Food Standards Agency. However, as a UK body, primarily driven by an English perspective, we have found engaging the Agency in effective partnership at policy (and delivery) level to be challenging.

We are actively working to improve our engagement with other stakeholders, but we need Welsh Government support to strengthen this further. The Minister for Social Services and Public Health has established a Working Group to consider whether the FSA's proposed food law regulatory reforms are appropriate to Wales' needs. DPPW are pleased to be participating in that Group, with partners, with a view to securing arrangements that have Welsh consumers' interests at their heart. We are aware that Scotland is developing its own approach to regulating food safety and we are keen that Welsh Government, working with local government in Wales, assesses what we can learn from Scotland's approach including their Scottish Food Enforcement Liaison Committee and whether such a model might work well in Wales.

The wider role of local authorities

In addition to the key responsibilities mentioned above, local authorities in Wales have important roles to play in delivering an effective vision for the future of food in Wales. Business support and wider community services are key to local economic success. Food festivals, such as the long-standing Abergavenny Food Festival, are becoming more and more popular across Wales and local authorities play a vital part in delivering events such as these that can play a key part in promoting Wales as a food destination. Effective joined up policy that recognises the links with wider services such as transport, highways, leisure, planning and licensing are important. The footfall of local authority officers at food businesses (and other premises important to the success of the food industry in Wales) can help to deliver on wider objectives relating to food.