



Economy, Trade and Rural Affairs Committee

SeneddEconomy@senedd.wales

27/01/2023

Dear Committee,

Consultation: Food (Wales) Bill

Thank you for the opportunity to participate in the above inquiry. Our remarks will focus on the implications of the Bill for the Welsh language. We are pleased that the Bill makes provision for making the proposed Food Commission subject to the Welsh language standards, by including the Commission in Schedule 6 of the Welsh Language (Wales) Measure 2011. Those standards include the policy making standards, which impose a duty on organisations to consider the effect of policy on the Welsh language. We would like to draw your attention to the Commissioner's advice document, *Policy Making Standards: Creating opportunities for persons to use the Welsh language and treating the Welsh language no less favourably than the English language*¹ in this regard.

We also note that the Bill makes provision for making the Food Commission subject to the duty, under the Well-being of Future Generations (Wales) Act 2015, to undertake sustainable development. This will mean operating in a way that will attain the national well-being goals. It should be noted that the well-being goals include "a Wales of vibrant culture and thriving Welsh language" and that the Welsh language should therefore be at the core of the Commission's work.

According to the Bill's Explanatory Memorandum, the aim is to establish a more sustainable food system in Wales, strengthen our food security, support the development

¹ [Policy Making Standards: Creating opportunities for persons to use the Welsh language and treating the Welsh language no less favourably than the English language \(welshlanguagecommissioner.wales\)](https://www.welshlanguagecommissioner.wales)

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of our food industry, improve Wales' socioeconomic well-being and enhance consumer choice (9). The Bill sets the following primary food goal: “the provision of affordable, healthy, and economically, environmentally, and socially sustainable food for the people of Wales” (2). It also sets five secondary food goals. One of these is “economic well-being”, which includes “Creating new economic opportunities through promotion of locally produced food” and “Promoting sustainable economic, social and community development” (3 (1)). In the Commissioner's opinion, this corresponds to aim 9 of the Welsh Government's *Cymraeg 2050* strategy, “Community and economy: support the socioeconomic infrastructure of Welsh-speaking communities”. When discussing communities with a high density of Welsh speakers, the strategy notes:

“A number of these areas are rural, and largely dependent on the agricultural industry, the food industry and tourism. [...] These areas also contain pockets of deprivation and rural poverty, with average salaries among the lowest in the United Kingdom.”

It is noted in the Explanatory Memorandum that “there could be a number of positive impacts across the agriculture sector flowing from the Bill” (500) and that “there is the potential that the Bill could have a positive impact on the Welsh language” (503). The following important aspects of the food industry and agriculture industry in Wales are discussed (501-502):

- the agriculture sector has the highest proportion of Welsh-speaking workers
- agri-food businesses, including agriculture, provide more favourable conditions for the use of the Welsh language compared with other industries
- almost two thirds (65 per cent) of Welsh speakers on small and very small farms in Wales speak Welsh every day

The Commissioner has drawn attention to many of these matters in the past and we are glad that they were considered in the drafting of the Bill². As the Explanatory Memorandum sets out ‘In many parts of Wales the farming community is also a bastion of our unique Welsh language culture’ (39). It is essential therefore that the Food Commission considers Welsh speaking communities as it strives to achieve ‘economic well-being’.

The Agriculture (Wales) Bill that is referred to in the Explanatory Memorandum, includes the Welsh language in its fourth objective, which is:

“to conserve and enhance the countryside and cultural resources and promote public access to and engagement with them, and to sustain the Welsh language and promote and facilitate its use, and in doing so” (Part 1, Section 1 (5)).

² Please see for example the Commissioner's [response](#) to the Economy, Trade, and Rural Affairs Committee consultation on the Agriculture (Wales) Bill and the Welsh Government's [consultation](#) on the Sustainable Farming Scheme.



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We believe that reference should be made to the Welsh language on the face of the Food Bill also with sustaining the Welsh language and promoting and facilitating its use as one of its goals and within the Food Commission's remit. This would be a means of encouraging those food producers who speak Welsh, together with others within the industry, to use the Welsh language and value Welsh skills. It would be consistent with the way in which the Bill "fits into the current policy and legislative landscape in Wales", as discussed in the Explanatory Memorandum (16) as it would be in accordance with the objectives of the Agriculture Bill. Including the Welsh language on the cover of the Bill would be an important step towards having a positive impact on the Welsh language. It would support the principles of the Welsh Language Measure, which established the official status of the Welsh language in Wales and that the Welsh language should not be treated less favourably than the English language. The Food Commission should be proactive in contributing to the vitality of the Welsh language in order to ensure that the Bill makes a real difference to the situation of the Welsh language, rather than merely reflecting the positive legislative context.

The Explanatory Memorandum discusses the importance of food from Wales to the economy, and the food and drink supply chain and the associated manufacturing and packaging processes (350). The value of the Welsh language as a unique marketing tool that can increase market potential, support business growth and develop innovative products should be remembered. There is evidence about the value of the Welsh language for promotional, branding and marketing purposes in the food and drink, manufacturing and marketing sector. The Commissioner's research shows that using the Welsh language makes a product stand out, reinforces the brand image and local origin of a product, offers opportunities to sell in new markets and is seen as a sign of quality. (Please see *The value of the Welsh language to the food and drink sector in Wales Research report*³). The supermarket Lidl is one of many that sees this, with the Welsh language used on the packaging of all its local Welsh produce, which currently encompasses 70 products⁴.

The normalisation of the use of the Welsh language is part of the Government's vision, as set out in *Cymraeg 2050*. The inclusion of the Welsh language on food packaging from Wales as a matter of procedure would contribute to the realization of this vision. The Food Commission should provide advice to public bodies and Welsh Ministers regarding the benefits of Welsh and bilingual marketing as a means of contributing to the "economic well-being" goal. One only has to look at the decision of the Welsh Football Association to change the name of the national teams from 'Wales' to 'Cymru' and its use of the Welsh language in the media and social media in international competitions such as the World Cup 2022 to realize the potential of the Welsh language for attracting attention and support in Wales and beyond. The Government's International Strategy⁵ also discusses the intention to raise the profile of the Welsh language and "use Welsh culture and the Welsh

³ [bwyd-a-diod-food-and-drink.pdf \(comisiynyddygyymraeg.cymru\)](#)

⁴ [LIDL speaks our language: Retailer announces Welsh language certification \(welshlanguagecommissioner.wales\)](#)

⁵ [International strategy \[HTML\] | GOV.WALES](#)



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language as a differentiating positive factor to promote sustainable tourism to international audiences". The Welsh language should be considered a unique feature for promoting Welsh food on an international stage as well.

We would welcome the opportunity to discuss these matters with the Commission when it is established. Our Hybu team⁶, for example, has extensive experience of working with companies and networks in the private sector in order to support them in using the Welsh language in their business. We hope that the above comments will be of use to you in your consultation. We urge the Committee to ensure that the Food (Wales) Bill contributes to the promotion of the Welsh language by:

- Making sustaining the Welsh language and promoting and facilitating its use as one of its goals, consistent with the aims of the Agriculture (Wales) Bill
- Ensuring that the promotion of the Welsh language is in the Food Commission's remit
- As a step towards ensuring that Welsh language is used on food packaging from Wales ensure that the Food Commission provides advice to public bodies and Welsh Ministers regarding the benefits of Welsh and bilingual marketing as a means of contributing to the "economic well-being" goal

Thank you for the opportunity to contribute to this consultation.

Yours sincerely,

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Welsh Language Commissioner

⁶ [Cynnig Cymraeg \(welshlanguagecommissioner.wales\)](http://CynnigCymraeg(welshlanguagecommissioner.wales))