



**Environment, Food
and Rural Affairs
Committee**

Rt Hon Steve Barclay MP
Department for Environment, Food and Rural Affairs
London
By email

17 April 2024

Dear Secretary of State,

Soil health inquiry: Government response

Thank you for your response to our report on Soil Health report. While we note that our recommendations are being considered alongside existing Government initiatives – many of which we welcome – questions remain about your Department’s objectives in this essential area. This letter sets out several of our more immediate queries, and we would appreciate a response to these questions by 17 May.

Soil monitoring

National soil monitoring is being undertaken as part of the terrestrial Natural Capital and Ecosystem Assessment (tNCEA) programme. Our report called for soil monitoring to receive equivalent funding to that for air and water, and for funding to continue into the long-term, given that changes to soil health can take many years.

The Government response fails to set out how much funding will be dedicated to soil health measurements, despite previous reports suggesting that soils receive less than 0.5% of resources for monitoring. It also notes that the tNCEA “is setting up long-term monitoring capability at a national/regional level”, without explaining what this will look like, and funding seems only guaranteed until the establishment of a soil health baseline by 2028. Continued assessment of this vital resource after this date – as would be expected for air and water quality - will be essential for understanding the impact of Government initiatives.

What “long-term monitoring capability” do you envisage for soil health after 2028 and what role will Defra and its arms-length bodies play?

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You suggest that a provisional update on the tNCEA programme will be published in 2024: will this update explain how much of the £140 million investment funding is being dedicated to water, air and soil monitoring?

Soil health indicators and testing

Although soil health indicators will not be ready until 2025, we are pleased that the Government is committed to establishing them. These indicators are vital for ensuring that all stakeholders are collecting comparable data on soil.

We recommended that once these indicators are established, the Government's ELM schemes should fund the standardised testing and collection of soil health data (aggregated and anonymised) to inform the soil monitoring programme, assist farmers and help us all understand the effectiveness of different interventions. It is disappointing that farmers will primarily be incentivised to collect and potentially share data on only soil organic matter (SOM). Your response does not suggest that ELMs will be used to help standardise data collection or enable a more granular soil health monitoring programme, both of which we consider essential.

Your response also points to anticipated guidance and tools that will support the collection of consistent and comparable soil data on farms. While these may encourage the monitoring of a wider set of soil health metrics, these guidance documents and toolkits are being published a year before the soil health indicators are ready. We have concerns that this misalignment of publication dates could lead to inconsistencies and confusion.

Why is the Government publishing tools and guidance for farmers on collecting soil health data a year before the national soil health indicators are established? Will you update these tools once the indicators are established to enable farmers to collect data that is aligned with these indicators?

You have suggested that farmers might be encouraged to share their SOM data to assess the state of England's soils. What is the rationale for this narrow focus when soil health encompasses a variety of physical, chemical and biological characteristics?

We recognise the challenges of collecting pre-existing soil health data and agree that the tNCEA will establish a more robust baseline by 2028. We welcome any efforts to gain an earlier insight into soil health trends, including the Big Soil Stocktake, but we remain unclear of its objectives. In particular, we have questions on how it intends to access privately held data and address the issue of incomparable datasets.

Can you provide further information on how the Big Soil Stocktake project will encourage owners of soil data to release their information and what success with this programme will look like?

Soil health targets

Your response appears open to developing new and more measurable targets for soil health and having them formally in place by 2028. However, we criticised the current target of having 60% of agricultural land “sustainably managed” by 2030 on the basis of there being no further ambitions after this point and due to the undefined nature of “sustainable management”.

What are the reasons for not committing to a more ambitious long-term soil management target beyond 2030??

We are pleased to see that the Government “recognise[s] the value in establishing a shared understanding of ‘sustainable soil management’”. We understand that this is a complex exercise, but the Government does not explain how this shared understanding will be used, nor does it set a deadline set for defining it. We note that a “delivery pathway” for achieving the 60% target is expected in due course.

How, and by when, will you work with the agricultural sector to develop a shared understanding of sustainable soil management? Will this be part of the “delivery pathway” to the target 60% of agricultural land being sustainably managed by 2030, and will this shared understanding be used to shape future iterations of farming incentives or regulations?

The January 2024 Agricultural Transition Plan Update

As your response highlights, several elements of the ELMs update in January align at least partly with the findings from the Soil Health report, including an uplift in some payments and new premiums for high impact actions, although you remain resistant to moving away from an “income foregone plus costs” calculation. We hope that as the evidence base improves, such uplifts and premiums might be cast more widely to focus attention on actions that lead to sizeable improvements to soil health. These could be an effective way to incentivise effective combinations of actions.

The January 2024 update explained that the Government is undertaking further analysis to understand the barriers faced by farmers when transitioning to more sustainable farming methods. We hope that the Government will use this to produce more concrete plans for tackling profitability, consumer choices, retailer/processor demands and other supply chain problems identified in our report; your response only commits to further engagement with the agri-food industry to work on a future revision of the EIP by 2028. **We would be grateful for your assessment of main findings of this call for evidence when the work is complete.**

Access to ELMs

We acknowledge the Government’s work so far to encourage wider access to its ELM schemes. My Committee will continue to take a keen interest in Defra’s work with the new Farm Tenancy Forum to make sure that tenant farmers can still be incentivised to improve their soils. While you state that the SFI Management

payment has led to an uptick in applications from smaller farms, there are no figures for this or for other types of farmers and growers that might find access difficult. Given your previous commitment to providing us with quarterly updates on applications to the SFI (see letter dated 8 December 2023), **we would like to see these updates include information on the diversity of farm types and sizes that these ELM schemes are attracting.**

Reviewing and adapting ELM schemes

In response to our call for more ambitious ELM schemes post-2026 and an annual reporting scheme, the Government refers to an ongoing review of its SFI and Countryside Stewardship schemes. However, it does not explain the parameters of this reviewing process. The response also states that the Government is reviewing how it will report on the impact of its ELM schemes, yet does not openly agree to publishing an evaluation programme for ELMs. Such a programme would be a vital tool for assessing the effectiveness of these schemes for outcomes such as soil health. A failure to back our proposal undermines the effectiveness and transparency of the review process.

Can the Government explain whether it will publish an evaluation programme for ELMs, and if not, explain why? In its absence, what metrics will be used to review the impact of the SFI and Countryside Stewardship on soil health?

Regulations and enforcement

We welcome efforts to support the use of organic fertilisers, including future regulatory reviews to minimise soil contamination, although we note that the response does not address regulations to address the source of soil contaminants. We understand that developing a future regulatory baseline for soil management and protection will take time and that the OEP is also looking into this matter. **Can you confirm if you will publish a formal response to the OEP's findings explaining how you will adapt soil protections in the future, including measures to tackle chemical and physical contaminants at source.**

We welcome the more supportive approach that the Environment Agency has stated it will take with farmers. Your response does not commit to more farm visits from the EA to support farmers with environmental protections. While new remote technologies will help with monitoring, these will not be able to identify issues below ground.

Soil remediation and reuse

We welcome several of the Government's initiatives in this area, including the creation of a Soil Reuse and Depot scheme, a potential soil bank, and revised codes of practice for the construction industry, although much of these policies were

already a matter of public record. We are glad to see that the tNCEA will establish some level of soil contamination monitoring too.

The Government response also emphasises a £78m Land Remediation Pathfinder Scheme that will provide grants to local authorities to “alleviate the costs of Landfill Tax where the tax may act as a financial barrier to the remediation and redevelopment of contaminated land.” We note that in a previous call for evidence, 37 respondents identified 18 sites where the landfill tax might be preventing remediation, but it is not clear that this is a major barrier to progress. Evidence suggests that both the private and public sectors struggle to source the finance for remediating soils through the planning system or through local authorities’ statutory duties. Grants for landfilling will also presumably encourage more landfilling of contaminated soil, rather than remediating this precious resource.

As part of its development of a landfill tax grant scheme, what assessment has been made of:

- **the potential impact on soil remediation efforts, compared to the overall estimated levels of contaminated soil in England;**
- **the risks of landfilling soil that could be remediated;**
- **and other factors that are limiting soil remediation efforts and will not be addressed by this grant?**

Guidance, skills, research and knowledge exchange

While your response in this area is welcome, the impact of your proposed measures on skills and knowledge will need to be assessed through data-driven metrics. The SFI Handbook provides only limited guidance on how to complete particular actions, not a holistic, whole-farm approach to a more sustainable future. Much more detailed assistance and/or on-site advice is likely to have a greater impact. We note that the Government is working with various arms-length bodies to enable access to expertise and advice for more “complex” activities. **We hope that this will be used to further encourage farmers to transition their whole business onto a more sustainable and productive path.**

The response also does not engage with our recommendation for funding more on-farm research and knowledge exchange, which is important for understanding what works and disseminating good practice.

Is the Government open to funding more on-farm research that can help the agricultural sector understand what soil management techniques work best for soil health in different contexts? Could this be embedded and feed into its ELM schemes?

I look forward to receiving your response.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Rt Hon Sir Robert Goodwill MP', written in a cursive style.

Rt Hon Sir Robert Goodwill MP
Chair, Environment, Food and Rural Affairs Committee