Alex Mackaness, Policy and Public Affairs Advisor, Soil Association – Written Evidence (LUE0037)

The Soil Association is a membership charity, formed in 1946 by a group of farmers, scientists, doctors and nutritionists who were determined to pioneer a world where we can live in health and in harmony with nature. Our vision is good food for all, produced with care for the natural world.

Introduction

We believe that nature-friendly, agroecological and organic farming are an integral part of the solution to the nature, health and climate crises and should therefore be supported accordingly by land use policy. As it stands, however, land use in England is primarily driven by a distorted market, undervaluing its broader impacts on local communities and ecosystems. A land use framework would allow the optimal use of land use in England, and help secure our transition to a sustainable future.

Responses to questions posed by the Committee

Questions 1. What do you see as the most notable current challenges in relation to land use in England? How might these challenges best be tackled? How do you foresee land use in England changing over the long term? How should competing priorities for land use be managed? **2.** What are the key drivers of land use change which need to be planned for, and how should they be planned for? What is the role of multifunctional land use strategies in implementing these plans? **3.** How might we achieve greater and more effective coordination, integration and delivery of land use policy and management at a central, regional, local and landscape level?

The challenge

Britain faces a land use crisis. Competing pressures on land use are significant and growing - from food production to nature recovery, housing, infrastructure, the transition to net zero and more. Yet the country's population density is high, and land is limited. We need an integrated approach to help us manage these conflicting priorities, and shift towards a land use system that works fairly for both people and planet.

As it stands, land use is largely determined not by how it can contribute towards our targets for climate, nature, health, and wellbeing, but instead by a distorted market. What may seem commercially rational in the short-term does not always reflect what is best for farmers nor the environment in the long-term. A recent Green Alliance Report explains that under current policy, there are pressures for large afforestation projects comprising commercial coniferous forestry, but the conversion of farmland to forestry is a controversial issue, sparking concerns around rural livelihoods, the future of food production, and the environmental impacts of the types of forestry that are prioritised. As our regenerative forestry report highlights, we need to see significant tree planting in the UK, but commercial tree-planting can have detrimental effects on wider ecosystems if it overlooks the importance of species diversity. The biodiversity of our forests is central to ensuring their productivity, resilience, and ability to adapt to climate change.

A more holistic approach to land use is therefore needed to help join the dots between market value and the broader social, cultural, and environmental implications of the chosen approach. In other words, while the market will have a central role to play in bolstering ecosystem service provision and restoring natural capital, it should be balanced with the right level of governance to ensure perverse outcomes are not commonplace.

The solution

As recommended by the National Food Strategy and advocated for by the Food Farming and Countryside Commission, we support the development of a **Rural Land Use Framework**. The Framework would be place-based, integrated and collaborative, to enable more informed and holistic decisions to be made around land use. We need a clearer understanding of what the most appropriate use is for a particular area of land, and how it can best be used to benefit local communities, the environment, and the economy. The Framework would enable landowners and farmers - as well as Government and the private sector - to understand what land use changes really mean in the long term, and how they can best help achieve our vital environmental targets, or enhance national food security. As such, farming land would be prioritised for healthy, sustainably produced food for human consumption (from fruit and vegetables to grains and pulses), rather than to produce bioenergy crops or intensive animal feed.

Two key steps in improving our understanding of the different impacts of land use - on climate change, soils, biodiversity, water, society, and the economy – will be gathering and sharing the data which determines those impacts. The Soil Association is developing the **Soil Association Exchange**, an online platform which will make that data available to

farmers and land managers (see attachments for further information). It will also share advice on how to farm more sustainably, as well as provide clarity on the range of financial opportunities available along the way (from subsidies to carbon markets). The platform will therefore allow farmers to make the best choice for their land, both in terms of sustainability and profitability – a balance that we need to aim for with all forms of land use moving forward.

Question 4. What impacts are changes to farming and agricultural practices, including food production, likely to have on land use in England? What is the role of new technology and changing standards of land management?

The changes to farming and agricultural practices over the next decade will have a pivotal role for land use in England, but how these changes will manifest themselves depends largely on the type of food system that our policy makers choose to support. The current model is based around cheap, highly processed foods and economies of scale – which will only be accentuated by existing and future trade deals that open the market to even cheaper foods produced at lower standards. By continuing in this direction, we would most likely see the further industrialisation of our local farming systems (a move towards 'mega-farms'), while less intensive producers could be pushed to opt for alternative income streams (such as carbon markets). The result would have serious repercussions on human health, our natural environment, and long-term food security.

If, on the other hand, policy makers support the advice of the National Food Strategy, by facilitating a 'Three Compartment Model,' we would shift towards an increasingly diverse agricultural system. The model illustrates a land use system comprising a mosaic of different landscapes – semi-natural land, high yield farmland and lower yield, agroecological farmland – to create the optimal balance between food security and nature recovery. This approach would equip us with better resilience against the unpredictability of both the climate and the global market.

While new technologies are likely to support the further industrialisation of farming - and are therefore often excluded from the discourse around agroecology - there is also growing recognition that the most efficient farming system would draw from both traditional farming wisdom and scientific innovation. However, it is vital that the governance of such technologies should be designed appropriately. In a recent report to the Soil Association, Cumulus Consultants explain that new technologies can indeed be highly beneficial in the transition to agroecology, but they need to be developed alongside farmers and, crucially, under the right governance. The report highlights the need for technologies which support a more equitable and just food system, rather than ones which merely consolidate corporate control.

Question 5. What impact are the forthcoming environmental land management schemes likely to have on agriculture, biodiversity and wellbeing? What do you see as their merits and disadvantages?

The changes to farming practices and food production will have varying effects depending on how the agricultural transition pans out – something which remains unclear. The general direction of ELMs, which will pay farmers and land managers public money for public good, represents a vital step forward for tackling the climate and nature crises. But progress has been slow, and many questions remain as to how the transition will impact the farming sector.

One major factor will be the uptake of the schemes, and since they are voluntary this is difficult to predict. Defra's own uptake target for the Sustainable Farming Incentive is 70%, which, if achieved, could allow for some notable improvements of our agricultural impacts on the environment. It is encouraging to see, for instance, that farmers will be rewarded for restoring their soils through the Sustainable Farming Incentive, or that Defra has finally committed to supporting organic farming. But further details are urgently needed for farmers to understand how these schemes will work in practice, and we need assurances from Defra that the scheme's ambition will be improved and raised over time.

Moreover, Government will only hit those uptake targets if the wider policy framework on trade and health recognises and rewards food production that is carried out above global minimum standards. Only this will keep farmers on the land and accessing higher value markets. There is a real tension here in which the true cost of food production must be met, while also ensuring not to aggravate the cost-of-living crisis. This will require integration with other policy approaches, such as a public procurement strategy that aims to strengthen the market for regional, agroecological and organic food production, while making healthy and sustainably sourced food the norm in schools, hospitals, care homes and across the wider social care sector.

In terms of the schemes' disadvantages, we want to see a greater emphasis on an integrated whole farm approach. Rather than tackling issues such as soil health, nutrient management and biodiversity in isolation, we should be using a whole farm approach – one which was meant to be at the heart of the agriculture transition, as Defra minister Victoria Prentis highlighted earlier this year. As it stands, it is unclear how the agricultural transition plan will encourage farmers to move towards this holistic approach to farming. But ultimately, the overarching benefits of the ELM schemes will rely on Defra's capacity to do so. It is only by

stepping back and understanding the bigger picture that we will begin to see transformative change across our food systems.

Question 6. What do you see as the key threats to nature and biodiversity in England in the short and longer term, and what role should land use policy have in tackling these?

Our industrialised food system is the primary driver of nature and biodiversity decline in the UK and globally. As Tim Benton outlines in a recent paper for Chatham House, intensive agriculture has degraded our soils and wider ecosystems, driving down the productive capacity of the land and thus requiring a constant cycle of intensification to keep up with demand. As a result, the excessive usage of chemical inputs such as fertilisers, pesticides and antibiotics has contributed to the UK being one of the most nature-depleted nations globally – ranking last among the G7 group of nations.

A shift to more sustainable farming methods is key to nature recovery. Indeed, we cannot meet our conservation targets without a shift to nature-friendly farming. Agroecological practices such as organic farming and agroforestry help restore biodiversity on our farms, working with nature rather than against it. The Apricot Centre, for example, is a mixed agroecological farm in Devon which has witnessed a 50% increase in birdlife on site since the start of start of its tenancy in 2015, due to its recent integration of over 3000 trees across the farm. The Apricot Centre represents one of many agroecological farms which is inviting wildlife back onto our farmland. It is vital that land use policy should acknowledge the role of agroecological farming in reaching our biodiversity targets, and encourage a widespread shift towards nature-friendly farming methods. It is also worth noting that many of these approaches to farming do not radically diminish yields. As outlined in the National Food Strategy, farmer Craig Livingstone successfully reduced his pesticide usage by 42% and industrial fertiliser by 32% over the course of five years, without reducing yields at all.

The need for an integrated approach to nature and climate

Moreover, there remains a significant danger that the pursuit of climate, or other environmental, targets may undermine England's biodiversity. This must not be allowed to happen, and indeed, great efforts should instead be made to prioritise action that benefits both climate and nature. These win-wins are all the more critical given the Environment Act will place a duty on Government to deliver certain environmental outcomes (through target setting). Adequate due diligence must therefore be undertaken to ensure that pathways towards the Government's Net Zero, National Determined Contribution target, and Sixth Carbon Budget targets enable these outcomes. Although measures like the large scale roll out of

bioenergy, or intensification of agriculture may move us towards our net zero ambitions, if at the same time they undermine our biodiversity and agricultural resilience, then our ability to mitigate and adapt to climate change in the future will be diminished. This will ultimately harm our ability to reach net zero and feed our population.

There is a therefore an urgent need for the Government's climate and nature advisors to begin conducting analysis in this light. This work would identify the extent to which Government plans to reach climate targets undermine efforts to reach wider environmental targets, and what can be done to minimise these trade-offs whilst maximising synergies.

Question 7. What are the merits and challenges of emerging policies such as nature-based solutions (including eco-system and carbon markets), local nature recovery strategies and the biodiversity net gain requirement? Are these policies compatible, and how can we ensure they support one another, and that they deliver effective benefits for nature?

Natural carbon removal offsets, through carbon sequestration and long-term storage in ecosystems or managed land, offer significant opportunities to farmers, landowners and land managers who have access to many of these natural offset options. They present a valuable opportunity for farmers to be rewarded for their role in mitigating the climate crisis – opportunities which will be a central feature of the Soil Association Exchange platform. However, these opportunities also present significant risks, and the success of their implementation relies on several key factors. Most importantly:

- carbon offsets should not be a substitution for wider emission reductions;
- they should optimise overarching benefits for climate, nature and health;
- sellers of offsets should have a plan in place to avoid and reduce all emissions in their own enterprise, including offsetting their own unavoidable emissions, before they are rewarded via the carbon market;
- sellers of carbon offsets (farmers, forest owners/managers and other land managers) should be fairly rewarded and remain in control of their contribution, when participating in wider net zero supply chain approaches;
- we favour approaches that add value to net zero strategies, by including removal of historic and supply chain emissions, as well as future and direct emissions.

It is therefore crucial that carbon offsetting should be effectively governed and regulated, to ensure the overall quality of its impacts.

When considering the urgency of the climate, nature and health crises in the UK, it becomes clear that agroecological farming is a highly effective nature-based solution. According to a recent report commissioned by the Food, Farming & Countryside Commission (FFCC), which follows the model of French think-tank IDDRI's 'Ten Years to Agroecology in Europe' (TYFA), a full transition to agroecology in the England is achievable, and would:

- keep the country fed while reducing diet-related health issues,
- reduce agricultural greenhouse gas emissions by 38%,
- allow widespread ecosystem restoration,
- improve biodiversity by diversifying crops, reducing chemical inputs and closing nutrient cycles.

It is therefore vital to recognise the role that agroecological farming has to play if we are to meet the government's ambitious climate, biodiversity, and sustainable development targets by 2030.

Alex Mackaness
Soil Association
April 2022