SUSTAINABLE SOILS ALLIANCE

January 2021

Environment, Food and Rural Affairs Committee Inquiry
Environmental Land Management (ELM) and the Agricultural Transition

A Response by the Sustainable Soils Alliance

The Sustainable Soils Alliance (SSA) was launched in 2017 to address the current crisis in our soils. Its aim is to campaign to restore UK soils to health within one generation by seeing soil health elevated as a political priority alongside clean air and clean water. The SSA is a non-profit organisation (CIC number 10802764).

This response focuses on the specific of soil health and how ELM can be designed to contribute to the government's targets of sustainably managed soils by 2030. The Agriculture Act commits to using ELM to pay farmers to protect and improve their soils, but so far there has not been any thorough consideration of how these payments will be allocated, with what justification, according to what practices and timeframe - or what results they can be expected to deliver.

The following recommendations look to address these points and contribute to general understanding of the challenges that currently face nationwide soil health. They are the results of the SSA's ongoing engagement with its members, Strategic Advisory Board and Science Panel, and specifically a November 2020 multi-stakeholder Workshop on 'Soil in ELM' attended by scientists, campaigners, businesses and farming organisations. The full report can be found here.

Recommendations:

1) Soil is critical for delivering all the Public Goods highlighted in ELM. and the scheme commits to paying farmers to protect or improve their soils. Sustainably managed soils are also an objective of the 25 Year Plan for the Environment. There needs to be an **explicit clarification** of the connection here – i.e. what does 'sustainably managed soil' look like – and how will ELM. achieve this? This is needed to establish a clear thread between soil measurement, soil management interventions, the delivery of public goods and the justification for public funds.
2) Depending on its design, ELM will include a number of levers to influence soil management including advice, incentivisation and regulatory compliance. However, these mechanisms will not resonate with farmers if they don't have a **baseline understanding** of soil's value – both public and private – first of all. Achieving this core ambition should be reflected in all aspects of the scheme.
3) Regular, consistent **soil monitoring** is the critical gateway to understanding soil's role and functions. Testing for nutrients is commonplace but this needs to be broadened out to include physical and biological indicators. This would provide a more thorough picture of the soil resource and enable farmers to identify and reverse degradation. It also generates a positive feedback mechanism whereby farmers see that their soils are changing and that their practices are having an effect – motivating them to make continued improvements. ELM. should be the vehicle to drive baseline soil measurement and universal and standardised monitoring, including region/climate/crop specific thresholds for farmers to benchmark against. A standardised approach to monitoring will enable ELM. to feed into national environmental commitments and verify value for money to the tax-payer.

4) A number of barriers to routine soil measurement exist. These include a lack of consensus about what to measure and how, uncertainty about how to interpret results and confusion about what can be measured 'in field' and what requires a laboratory. To understand these barriers and overcome them, a **Test and Trial** is needed, one that will provide the foundations for a nationwide scheme.

5) There are clear justifications for **economic incentivisation** when it comes to soil. To reverse legacy damage, to counter commercial pressures, to monetise otherwise 'invisible' public goods and to protect the country's most productive soils from conversion. To demonstrate ROI to the Treasury, taxpayers and farmers, the scheme needs to be explicit about which soils are in need of investment and why.

6) Payments for soil management should be made according **to practices rather than results/outcomes** – which are often beyond the control of farmers. Practices should be evidence-based (proven to generate results), verifiable (to show they took place and happened at the right time for their specific context), joined-up (i.e. part of a series of interventions) and flexible to regional variations – including soil type, land capabilities and localised issues. Payments by results, according to clear (farming-specific) thresholds, might be blended in after time, once a confidence in the connection between actions and outcomes has been established.

7) There is a role for a **regulatory baseline** when it comes to soil management that is causing negative externalities and the new scheme should not pay for things that are required by law. However, awareness and enforcement of existing regulations are currently very low and an overly punitive model will disincentivise participation in ELM. The new regulatory system (post-Stacey Review) should provide a clear demarcation of what can/can't be incentivised and ELM should be a vehicle to drive awareness/understanding of, and later compliance with these rules.

8) There is a clear role for **soils advice** in ELM, which should be flexible, simple, easy to engage with and encourage straight-forward actions. Farmers should have access to a suite of advice options so they can choose what works for them - including peer-to-peer learning, certification schemes and guidance – rather than simply a dependence on advisors. All advisers specifically need to be explicitly trained on soils e.g. BASIS Soil and Water.

9) **Carbon** is the closest thing to a universal indicator of overall soil health. As well as productivity benefits, carbon is a source of energy for soil biology and important for climate change mitigation. As such, carbon could act as the pillar of any soils policy reflected in payments to measure or increase carbon stocks, or even a minimum standard, enforced through regulation. Carbon additions are easier to quantify than outcomes (which are soil-type/climate dependent) and so straight-forward to implement through policy.