SUSTAINABLE
SOILS
ALLIANCE

March 5 2021

Red Tractor Standards
*Consultation response by the Sustainable Soils Alliance*

**Introduction**

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

In our response we do not propose to address the individual standards themselves, but the proposed change to incorporate soil across the scheme's six sectors under the umbrella of 'Environmental Protection' listed in Annex 1) and summarised in the RT announcement as follows:

*The inclusion of the Farming Rules for Water, which are already legislation and aim to reduce soil erosion and nutrient run-off. The requirements have been adapted from the legal requirements to ensure they are meaningful and can be easily assessed.*

We welcome the decision to better incorporate soil health into the new Red Tractor standards and to align with the critical soil-specific legislation. Given RT's ambition for its standards to cover the whole spectrum of farming's environmental impacts, soil has (hitherto) been conspicuous by its absence. This addition comes at a time of heightened political, business and corporate interest in soil health and the numerous farm productivity and ecosystem benefits it provides (biodiversity, flood risk management, clean water, carbon sequestration).

We especially welcome the inclusion of the rules in the standards because, due to minimal investment in their communication and enforcement, awareness of the rules is patchy at best. Our experience is that even among more 'sustainably minded' farmers understanding about the nuances and details of the rules and how they are implemented and enforced is low. If these communities are not being reached, there is little chance of those responsible for the worst incidents being cognisant of the rules.

Inclusion of the Rules in RT standards will be an important step in raising awareness of them among farmers and driving behaviour change throughout the industry.

**However, we are concerned that this addition to the standards sets the bar too low, that it is inconsistent with the broader aims of Red Tractor, and that it is a missed opportunity to capitalise on the groundswell of interest in soil health, and on the efforts to raise environmental farming standards.**

1. *Regulatory Baseline:*

- Our understanding is that the intention of Red Tractor is to raise British standards above legal minimums. However, as the consultation acknowledges, the 8 Farming Rules for Water (8 FRfW) are already legislation – indeed they have been legislation since 2018 - and so represent a regulatory baseline which should be already embedded into farming behaviours.
- We would also challenge the premise that the 8 FRfW are enough to achieve the desired objective of 'Environmental Protection' when it comes to soil health. As is implicit in the title, the 8 FRfW rules were

created with water in mind – in fact they were designed to achieve national compliance with the Water Framework Directive. Their impact on soil has always been a secondary consideration – essentially making soil health a by-product of water health. They do not address or reflect soil in the round and regulate for all soil services and functions.

- The regulatory framework has therefore failed to give soils the protection they need - and is about to get weaker. Alongside the 8 FRfW, soil management is governed by BPS cross-compliance rules (GAEC 4, 5, 6) which include providing minimum soil cover, minimising soil erosion and maintaining the level of organic matter in soil. These rules stand to fall once the transition period from the EU CAP comes to an end.

**Recommendation:**

- We hope that the introduction of the 8 FRfW represents the first of a series of interventions by RT on soil health, and that its standards will evolve, and can be used as a mechanism for driving soil management over and above basic regulatory compliance over time.

  As part of this process, we would like to see RT consider how it might go above and beyond 8 FRfW to address soil's numerous roles and functions. Specifically RT should consider the scope and impact of the GAECs (listed above) and where applicable, integrate them into their standards to provide a clear message about RT's commitment to fostering soil health among its farmers and delivering the societal benefits of improved soil health to the wider public who put their trust in the RT badge.

2. *Soil Management Plan/soil measurement*

- We welcome the inclusion of a soil management plans in the standards (new to all sectors other than Crops and Sugar Beet and Fresh produce), however we have concerns about the level of detail provided to help farmers create such a plan.
- Specifically, the plan template signposts the document 'Protecting our Water Soil and Air – A code of practice for farmers growers and land managers'. Whilst the advice contained within the document remains sound, it is quite lengthy and was drafted in 2009, since then a great deal has changed in terms of technology, policy and soil science, specifically:
    - It refers to cross-compliance (no longer relevant).
    - It makes no reference to the 8 FR4W which were introduced 9 years later.
    - It makes no reference to RB209 (The Fertiliser Manual (RB209), published on the website of the Agriculture and Horticulture Development Board (AHDB)).
    - It makes no mention of the numerous evolving apps and technologies.

**Recommendation:**

- When it comes to soil, farmers need advice that is clear, simple, up-to-date and consistent across the board – with all regulations and available best-practice advice.

  As such, we would like to see the plan template updated to reflect the policy and research changes referred to above. Specifically, we would like to see it take into account the work of the AHDB's Soil Biology and Soil Health partnership which has developed a number of tools designed to help farmers and growers maintain and improve the productivity of UK agricultural and horticultural systems, through better understanding of soil biology and soil health - including best practice advice about what, how and when to measure soils.

3. *Soil Testing*

- When it comes to environmental protection in the standards, RT's objective is laid out as: *Fertilisers and pesticides are only used when absolutely necessary to keep crops healthy using methods that reduce the risks to wildlife and the environment wherever possible.*
- Soil health is a critical part of this picture as chemicals/nutrients pass through soil into watercourses or attached to soil particles in sediment, hence the requirement in the 8 FRfW for farmers to *test their soil*

*pH, Nitrogen, Phosphorus, Potassium, and Magnesium levels, on cultivated land, a minimum of every 5 years.*

- However, we consider the framing of the issue – i.e. nutrient/chemical pollution as the critical indicator of environmental protection – as unnecessarily narrow. By the same token, we see the emphasis on testing soil chemistry (outlined in the 8 FRfW, and now the RT Standards) as a one-dimensional approach to soil health.
- In fact, soil health needs to be understood in terms of its physical and biological as well as chemical properties. Soil structure influences run-off and filtration (and hence accumulation of soil in rivers and streams) while soil carbon is the critical indicator of soil health – for productivity benefits as well as public goods - biodiversity, climate change, and water storage and filtration.

**Recommendation**

- The regular, consistent monitoring of soil is the critical gateway to understanding soil's role and functions. It 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. If soil testing is only framed in terms of chemicals, it will only be understood in terms of harm reduction, and not the numerous benefits that healthy soils provide.
- With that in mind, we would like to see soil structure and Carbon/Soil Organic Matter added to the list of tests expected under the standard – going over and above the 8 FRfW. There are a growing number of protocols for measuring and valuing soil structure and carbon sequestration that are affordable and practical at a field level that are already being widely applied. Again, we would draw attention to the AHDB Soil Biology and Soil Health Partnership for examples of these.
- Embedding of soil carbon monitoring in particular would be a critical step towards driving soil understanding and appreciation throughout land management.

*4. Branding Opportunity*

- Red Tractor is widely known among farmers and consumers as the most recognised and influential vehicle for championing British farming and produce. Yet, judging by the consultation and RT website, soils are only presented in negative terms and understood only in regulatory terms.
- We see this as a missed opportunity. 95 percent of the food we eat is directly or indirectly produced on our soils and the health of the soils is a critical factor in determining the quality of the food that comes from them - healthy, well-structured soil means strong, nutritious and disease-resistant fruits and vegetables.
- With over 700 soil types, we have some of the most diverse soils in the world – specific soil types have influenced the food crops that grow from one part of the country to the next, inspiring regional farming methods, cuisines, and cultures - from the loamy soil needed for the rhubarb triangle to the sandy soils (enhanced with local seaweed) that give Jersey Royals their unique flavour.

**Recommendation**

- While we welcome the inclusion of the 8 FRfW in the new standards, this is a relatively dry and uninspiring initiative. Alongside this development, we would like to see RT take a more positive, patriotic and appreciative approach to our soils – celebrating their diversity and their role in our culture, landscape and crops. As well as in standards and guidance, we would like to see soils feature more prominently on the RT website, in its advertisements and its marketing materials.
- This would be an opportunity not just to promote soil health but also for RT to brand itself at the cutting edge of consumer and farmer appreciation of the importance of soil. Our experience with supply chain players (retailers and food manufacturers) is that there is a growing appetite for soil-specific standards and education that they can embed into their sustainability reporting and consume education.
- For best practice examples of some of the inspiring and educational on-line tools being used to raise awareness and interest in soils among a wide variety of audiences, visit www.uksoils.org.

Annex 1: New Standards relevant to soil:

**EC.1:** A farm map must be present (either revised or new according to different sectors), with soil types, their condition and what they're prone to. Explanation for change: *Consolidation of map requirements into one standard for efficiency, with inclusion of soil.*

**EC.2**: A Soil Management Plan must be established and implemented (new to all sectors other than Crops and SB and Fresh produce) Explanation for change: *so that long-term sustainability of soil is given an appropriate level of focus.*

**EC.3**: Risk to soil must be considered before any work is carried out (new to all sectors). Explanation for change: *so that long-term sustainability of soil is given an appropriate level of focus.*

**EC.3.1**: Livestock do not cause poaching which leads to soil erosion and runoff (new and for Livestock only).

**EC.4**: Soil testing must be completed at least every five years where organic manures or manufactured fertilisers are applied (new for all). Explanation: *Soil testing requirements introduced as per the Farming Rules for Water.*

**EC. 5** Potential pollutants must be stored in a manner that minimises the risk of contamination and pollution to crops, feedstuffs, animals, soils, groundwater and watercourses (Revised for all). Explanation: *Updated to reflect Farming Rules for Water*.

**EC. 21**: Manufactured fertilisers and organic manures must be applied in a manner that minimises the risk of contamination or pollution (Revised for all). Revised to say that the results of soil testing must be considered.