

EFRA Inquiry into Soil Health, Final Sessions:

Observations and Conclusions

Introduction

On 18 July the [final oral evidence](#) session of the Environment, Food and Rural Affairs (EFRA) Committee's inquiry into soil health took place. Giving evidence was the Defra Minister for Food, Farming and Fisheries Mark Spencer MP, along with Defra colleagues Fiona James and Sion McGeever.

The following is the Sustainable Soils Alliance's observations about the session, and its key recommendation to the Committee as it considers its report.

1. *Observations*

- The Sustainable Farming Incentive (SFI) was cited throughout as the magic bullet for achieving **the nationwide target for sustainably managed soils**. This represents yet another downgrade in ambition witnessed under this government:
 - The original (2009) target was for all of England's soils to be sustainably managed by 2030¹.
 - The 2023 Environmental Improvement Plan downgraded this ambition to just 60% of *agricultural soil*². With agricultural soils covering 63% of England's land area³, this takes the target from 100% of England's soils to just 38%, and excludes forested land, natural open land, urban areas, and residential gardens.
 - The SFI currently has 3,000 agreements in place. This represents just 3% of the 104,476 agricultural holdings in England⁴, 102,000 of whom claimed basic payments⁵, and translates to roughly 1.8% of England's land.
- The minister's faith in **the Sustainable Farming Incentive** is particularly worrying given the growing limitations of the scheme, which originally had soils at their heart.
 - Half of the soil-specific actions have been eliminated during the course of the inquiry - not to achieve environmental outcomes but as a result of perceived administrative complexity for farmers.
 - The scheme is voluntary and pick and mix. As the committee has heard, it is straight-forward for farmers already implementing the necessary actions - but won't incentivise any who aren't already on the pathway to sustainable farming practices.
 - The scheme does not pay market rates for the actions required – e.g. £5.80 per hectare to produce a soil management plan and test soil organic matter. Something the Minister seems keen to disguise through his refusal to publish the underlying calculations.
- According to the Minister, soils do not **need to be regulated** because it is in a farmer's best interests to protect them, and because 'carrots were better than sticks'. This faith in enlightened self-interest seems misplaced given that 60-70% of European soil is degraded as a direct result of

¹ Department for Environment, Food and Rural Affairs, 2009. *Safeguarding our soils: A strategy for England*

² Department for Environment, Food and Rural Affairs, 2023. *Environmental Improvement Plan*

³ Department for levelling up, Housing and Communities, 2022. *Land use statistics: England 2022*

⁴ Department for Environment, Food and Rural Affairs, 2023. *Structure of the agricultural industry in England and the UK*

⁵ Farmers Weekly, 2022. BPS cash arrives for farmers in England, but cut by 20%

unsustainable management practices⁶, and 80% of costs associated with degraded soils occur off-site and so are either invisible or of limited concern to those whose actions may be causing them⁷. We agree that 'sticks' are not the answer, but regulation can be a vehicle to deliver direction, clarity, consistency and alignment that is so badly lacking.

- Further detail was provided about the £140m Natural Capital and Ecosystem Assessment, which will be the means to establish **a comprehensive baseline of the health of England's soils**, however there is still no clarity about what % of this total will be committed to soils.
- Meanwhile Minister described **on-farm measurement of soils** as an 'obsession', and expressed concern that data collection would provide a barrier to farmers taking part in any scheme. This ignores the growing need and appetite – at government and corporate level for decisions-grade information capable of identifying what works and demonstrating progress over time – as the Northern Irish government's investment in soil carbon baselining every farm in NI demonstrates.
- When it comes to **advice and education** about soils, the minister put his faith, not in government supported services, but peer-to-peer learning, farming events like Cereal and Groundswell – and through advice from the Agri-industry because, apparently, 'everyone is on the same journey'.
- When it came to alignment between the public and private sector to achieve sustainable soil management. The Minister acknowledged that "*This is an area we need to do more work on... and also come up with a system that does not create perverse motivations that damage the environment*".
- Finally, plastic in soils was the responsibility of consumers and can be addressed by improved information about what should be put into household recycling

Conclusions

The Minister began the session by defending his decision to abandon the Soil Health Action Plan for England (SHAPE). What followed was a ninety-minute discussion demonstrated why a strategy is so badly needed.

Despite numerous uses of the term 'complexity' to describe both the nature and management of English soils, the minister's approach to the problem appears remarkably simple – and complacent. Judging by this session, responsibility for English soils lies between unregulated farmers, voluntary government schemes, farming conferences and consumer recycling behaviours.

This flies in the face of the conclusions of the Office for Environmental Protection which concluded earlier this year that it was "*unrealistic to achieve the sustainable management of soils by 2030, given the scale and scope of the challenge, the lack of measures, and the short timeframe.*"

Nothing in the session gave any confidence that this goal is anywhere close to being achieved – indeed it confirmed the impression that decades of disjointed, short-term thinking and neglect will continue. The abandonment of the SHAPE might be 'better and quicker' for the government, but for English soils, nothing could be worse in the long-term than the lack of strategic thinking and ambition that goes beyond the timeframes of party politics.

We urge the committee to address this situation by calling on the government in its final committee report to revisit and publish its Action Plan and give the country a soils strategy for the first time since 2009.

⁶ European Commission, Directorate-General for Research and Innovation, Veerman, C., Pinto Correia, T., Bastioli, C., et al., *Caring for soil is caring for life: ensure 75% of soils are healthy by 2030 for healthy food, people, nature and climate: interim report of the mission board for soil health and food*, Publications Office, 2020.

⁷ <https://portal.lancaster.ac.uk/portal/news/article/lancaster-joins-the-call-for-soil-health-post-brexite>

Annex 1

Other points raised during the course of the session included:

1. Why no Soil Health Action Plan for England?

An early line of inquiry was the decision made by the Minister last November to abandon the Soil Health Action Plan for England and replace it with two pages within the Environmental Improvement Plan. Barry Gardiner MP (Labour) asked, for examples of *'any other element in your brief where degradation costs the economy £1.2 billion, but that has no action plan to do anything about it?'*

The minister was defiant that Defra could improve soil health *"better and quicker"* through the EIP, and pointed throughout the hearing to the (voluntary) Sustainable Farming Incentive and Countryside Stewardship schemes as the principal policy mechanisms. However, he refused to be drawn on a target number for farmer take-up of the SFI, or how much the £1.2bn cost will come down over time as a result. As it stands, there are 3,000 live agreements under the current SFI, but Defra are hoping for more engagement when the 2023 scheme opens in August.

2. A regulatory review – but little appetite for regulation

Ian Byrne MP asked whether the severity of the soils crisis necessitated the introduction of legislation to better motivate farmers in the right direction. The Minister pointed to a regulatory review due to take place by March 2024, which will review soil protection and identify gaps, overlaps and areas where the *carrot* isn't preventing soil degradation – seen in runoff and nutrient control.

The Minister's repetition throughout that he favoured *"carrots over sticks"*, that farmers needed to be given the chance to improve before being regulated and that regulation was a *'last resort'* gave a clear picture of his view on the need for proactive protections for our soils.

3. The reform and impact of the SFI Soil Standards

Derek Thomas MP asked whether the "pick and mix" system of SFI actually works while other committee members raised concerns that a combination of low targets and flexibility would mean that many farmers could be compliant with the SFI soils actions without making any meaningful change in practice or actually improving soil health.

The Minister replied that the best way to engage with farmers is by having *"a large menu of items"* from which they can choose to suit their farming system – and not be *'boxed in'*. All three government representatives maintained that the June decision to reform the Soil Standards reflected farmer concerns about the practicalities of the system, rather than their effectiveness in delivering environmental outcomes.

4. The finances underpinning the Standards

The Minister made it clear he has no intention of publishing the calculations that lie behind the SFI payment rates, but that they should balance motive and reward, and fairly distribute the fixed budget of £2.4 bn.

By way of example, two of the soil-specific actions (minimising bare ground and single species cover crop) were abandoned because they did not work, while one (adding organic matter) represented good, profitable farming practice, so shouldn't be paid for by the taxpayer. The Minister would not be drawn on whether this was sufficiently *'standard practice'*.

5. National Monitoring

The £140m Natural Capital and Ecosystem Assessment will be the means to establish a comprehensive baseline of the health of England's soils based on JNCCs June 2023 report, *Towards Indicators of Soil Health*. The report has identified 12 metrics (biological, chemical and physical) and mapped against them 4 ecosystem services, climate regulation, water regulation, food/fibre provision and biodiversity.

In response to Sheryll Murray MP's question as to why the programme was taking so long (no indicators for another 18 months, no baseline until 2028), the panel pointed to the complexity of UK soils, but assured the Committee that there was a budgetary commitment to baseline by 2028 within the NCEA, although like everything this was subject to review. Defra itself seems to be unsure of how much of the NCEA budget is earmarked for soils, making it impossible to know whether sufficient resources are being dedicated to monitoring soils in England.

6. On-farm into nationwide monitoring

The Land use framework will be used to identify different soil types, while the NCEA will map the country's soils and establish a baseline against which farmers will be able to test their own soils. Defra are developing guidance to help farmers to identify their soil in a way that is consistent with the 12 categories developed by the NCEA to enable comparisons especially on SOM.

MPs made frequent reference to Northern Ireland's investment in SOM baselining every farm in the country, something that Defra is reviewing. Also being reviewed is whether data will be collected through NCEA, SFI or a separate scheme. The Minister felt that data collection should not be a barrier, but instead, focus should be on incentivising action, not "*obsessing over measurement*".

7. Limited detail on progress towards improved soil health

Responding to a question on whether soil health is improving or worsening, the minister explained that the diversity of soils in the UK makes it hard to know: "*The (upcoming) Land Use Framework will be a good way to identify the soil types we have up and down the country... but it also highlights the complexity of the system... there isn't a one-size-fits-all solution for all those different soil types*".

Similarly vague was the response to Derek Thomas MP's question of how the government defines "sustainably managed". To this the minister responded: "*...To me, it means: are the practices that we pursue regularly repeatable for the next century, and are we having a detrimental or positive impact on the environment?*" However, it will be difficult to know the impact without being somewhat obsessive over measurement.

8. Questions remain about the role of private finance

The various marketplaces for ecosystem services are developing rapidly, and there was concern among the Committee that this could interfere with government plans and targets for sustainable soil management. The Minister acknowledged that "*This is an area we need to do more work on... and also come up with a system that does not create perverse motivations that damage the environment*".