

23 July 2024

Dear Secretary of State,

We are writing to you in our capacity as Directors of the Sustainable Soils Alliance, a campaigning organisation that calls for government policies which will achieve the goal of sustainably managed soils within the space of a generation.

We like to start by congratulating you on your party's success at the General Election, on your appointment to lead the Department for Environment, Food and Rural Affairs and for your rapid identification of the five policy priorities you wish to pursue while in office.

Healthy soils are critical for delivering four of these five priorities. Indeed, they are unique in their capacity to connect and align these separate outcomes. We would like to take this opportunity to demonstrate how and why this is the case and draw to your attention the policies needed to restore, protect and enhance our soils.

- 1. Clean up rivers, lakes and seas:** As you will know, the agriculture sector is the largest contributor to river pollution<sup>i</sup>, and soils' a significant underlying factor, since eroded soils are both a pollutant themselves and a vector of other (fertiliser and pesticide) pollutants. Sustainable soil management will drive cleaner waterways through increased water holding capacity<sup>ii</sup>, erosion prevention and the capture and filtration of pollutants before they enter watercourses.
- 2. Protect communities from flooding:** Healthy, well-structured soils act as 'natural flood management infrastructure'. They can increase the depth that water is absorbed to, and therefore the volume of water that can be stored underground<sup>iii</sup>. Poorly managed, compacted soils meanwhile don't allow drainage and increase muddy surface runoff which not only increases the likelihood, but also the severity of flood incidents.
- 3. Support farmers to boost food security:** Healthy soils are critical for domestic food production and our nation's overall food security, which has been brought into the spotlight by global conflicts and the uncertain effects of climate change. Events this year and last showed how extreme weather – both heat and rainfall - threatens domestic productivity<sup>iv</sup>. Climate change is now the number one reason that families are paying more for their food<sup>v</sup>.
- 4. Ensure nature recovery:** Soils host a tremendous diversity of life forms and are themselves vital for above ground biodiversity<sup>vi</sup>. The complex interaction between soil life, plants and soil chemistry and physics are essential for soil and habitat formation, maintenance and restoration, as well as the cycling and storage of carbon from the atmosphere.

For English soils to deliver the services outlined above, they need an ambitious policy framework, aimed at their protection, enhancement and restoration. To that end, we have identified the priority policies that should underpin this framework.

As you can see, they are proportionate, affordable and targeted, and many of them echo the recommendations of the year-long EFRA Committee inquiry into soil health, published at end of last year. Crucially, many of them build on initiatives that are either underway, or were shelved by the previous government, so have the opportunity for rapid implementation and impact. They are:

1. The reinstatement of the **Soil Health Action Plan for England**, promised by the previous government, drafted and then subsequently shelved. An ambitious, strategic action plan has the potential to weave together all the policy drivers of soil health - regulations, advice, standards, monitoring and incentives into a coherent whole, sending a clear message to farmers and the public about government recognition of soil's importance.
2. A robust, **soils-focused regulatory framework** underpinned by a commitment to long-term enforcement and communication. This should fill the regulatory gap for soil protection and restoration (existing soil 'regulations' are focused on water) and can build on extensive recent analysis. We would draw your attention to two reviews of soil regulations, currently underway by the OEP and your colleagues in the DEFRA soils team.
3. The establishment of a **high-integrity, robust private market for eco-system services**, including soil carbon and biodiversity. This should involve extending the remit of the British Standards Institute's work on nature markets, bringing supply chain investment (insets) into scope as well as the tools and technologies for carbon and biodiversity accounting. The market should be built on universal high standards that will generate tangible, permanent environmental benefits and a fair income for land managers.
4. The government's Environmental Land Management Scheme should be used as the vehicle to establish a **universal 'language' of soil health**, built on consistent, but not uniform metrics, standards and principles. ELM payment rates for sustainable soil management should be reviewed to ensure they are proportionate and reflect both underlying costs and the value of the services soils provide.
5. Free and open access to the **national soil classification and soil maps of England and Wales**. This publicly funded resource is currently the only consistent, universal resource for describing and understanding the whole soil profile to 1m depth. By following Scotland's example and transferring this vital resource back to public ownership, the government can take a significant step towards increasing and aligning the technical understanding of all those working for soil protection and restoration.

In summary, the investment of time and resource in soil protection and restoration should be the number one priority for the new government because without it, four of the five environmental ambitions of this government are unachievable.

We would welcome the opportunity to discuss these proposals in greater detail, and explore how we might best support you and your colleagues in your work in the years ahead.

Yours sincerely

Matthew Orman, Director, SSA, [matthew@sustainablesoils.org](mailto:matthew@sustainablesoils.org)

Ellen Fay, Director, SSA, [ellen@sustainablesoils.org](mailto:ellen@sustainablesoils.org)

## Annex

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<sup>i</sup> Agriculture is the largest contributor to river pollution, with Defra figures showing that 40% of river pollution comes from farms, compared to 36% from water companies

<https://lordslibrary.parliament.uk/river-pollution-and-the-regulation-of-private-water-companies/>

<sup>ii</sup> Soils without earthworms (a key indicator of soil health) can be up to 90% less effective at soaking up water

[https://ec.europa.eu/environment/archives/soil/pdf/soil\\_biodiversity\\_brochure\\_en.pdf](https://ec.europa.eu/environment/archives/soil/pdf/soil_biodiversity_brochure_en.pdf)

<sup>iii</sup> UK soils store an estimated 130 trillion litres of water – much more than contained in all UK lakes and rivers combined <https://www.theccc.org.uk/wp-content/uploads/2016/01/CCC-Written-Submission-to-Environmental-Audit-Committee-Inquiry-into-Soil-Health.pdf>

<sup>iv</sup> Key crop harvests in early 2024 were down by up to a fifth, caused by record breaking wet weather, driving up food prices as the UK becomes more reliant on imports

<https://www.theguardian.com/environment/2024/apr/29/washout-winter-spells-price-rises-for-uk-shoppers-with-key-crops-down-by-a-fifth>

<sup>v</sup> Research by the Energy and Climate Intelligence Unit demonstrated that throughout 2022 and 2023, climate change was the main driver of food price inflation, adding £605 more to annual food bills <https://www.independent.co.uk/climate-change/food-prices-increase-shopping-climate-b2453992.html>

<sup>vi</sup> Soils are home to over half of Earth's species, including 90% of the world's fungi and more than 50% of all bacteria <https://www.pnas.org/doi/full/10.1073/pnas.2304663120>