

# Agenda – Economy, Trade, and Rural Affairs Committee

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Meeting Venue:

Committee room 5 – Tŷ Hywel  
and video conference via Zoom

Meeting date: 15 May 2025

Meeting time: 09.30

For further information contact:

**Robert Donovan**

Committee Clerk

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## Hybrid

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### Private pre-meeting

09.10 – 09.30

### Public session

09.30 – 13.50

### 1 Introductions, apologies, substitutions, and declarations of interest

09.30

### 2 Soil Health in Agriculture: Panel 2

09.30 – 10.45

(Pages 1 – 39)

Andrew Tuddenham, Head of Policy, Soil Association Cymru

Rhys Evans, Wales Manager, Nature Friendly Farming Network

Ellen Fay, co-Executive Director, Sustainable Soils Alliance

Attached Documents:

Research Brief



Evidence paper – Soil Association Cymru

Evidence paper – Nature Friendly Farming Network Cymru

## **Break**

10.45 – 10.55

### **3 Soil Health in Agriculture: Panel 3**

10.55 – 12.10

(Pages 40 – 64)

Abi Reader, Deputy President, NFU Cymru

Teleri Fielden, Policy Officer, Farmers' Union of Wales (FUW)

Fraser McAuley, Senior Policy Adviser, Country Land and Business Association (CLA)

Attached Documents:

Evidence paper – Farmers' Union of Wales (FUW)

Evidence paper – National Farmers' Union Cymru (NFU)

## **Break**

12.10 – 12.50

### **4 Soil Health in Agriculture: Panel 4**

12.50 – 13.50

(Pages 65 – 82)

Huw Irranca-Davies MS, Deputy First Minister and Cabinet Secretary for Climate Change and Rural Affairs, Welsh Government

James Cooke – Head of Agricultural Land Use Policy, Welsh Government

Andrew Chambers – Head of Agriculture Legislative Framework Branch, Welsh Government

Naomi Matthiessen – Deputy Director – Landscapes, Nature & Forestry, Welsh Government

Attached Documents:

Evidence paper – Welsh Government

## **5 Papers to note**

13.50

### **5.1 Official Controls (Extension of Transitional Periods) (Amendment) Regulations 2025**

(Page 83)

Attached Documents:

Letter from the Deputy First Minister and Cabinet Secretary for Climate Change and Rural Affairs – 1 May 2025

### **5.2 Request for economic impact assessment of proposed closures in languages and cultures at Cardiff University**

(Pages 84 – 85)

Attached Documents:

Letter from the Chair to the All-Party Parliamentary Group on Modern Languages, UK Parliament – 1 May 2025

### **5.3 UK-EU Parliamentary Partnership Assembly**

(Pages 86 – 97)

Attached Documents:

UK-EU Parliamentary Partnership Assembly (PPA): Fifth meeting summary report – 29 April 2025

#### **5.4 Meeting of the Inter-Ministerial Group on UK-EU relations**

(Page 98)

Attached Documents:

Letter from the Cabinet Secretary for Economy, Energy and Planning – 8 May 2025

#### **5.5 Memorandum of Understanding between the Department for Work and Pensions and Welsh Government – Delivery of the Economic Inactivity Trailblazer in Wales (“The Trailblazer”)**

(Page 99)

Attached Documents:

Letter from the Cabinet Secretary for Economy, Energy and Planning to the Chair of the Legislation, Justice and Constitution Committee – 8 May 2025

#### **6 Motion under Standing Order 17.42(ix) to resolve to exclude the public from the remainder of the meeting**

13.50

#### **Private session**

13.50 – 14.10

#### **7 Consideration of evidence following the meeting**

13.50 – 14.05

#### **8 Apprenticeship Pathways: Key issues discussion**

14.05–14.10

(Pages 100 – 114)

Attached Documents:

Key issues paper

# Agenda Item 2

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## **Soil Association Cymru**

### **Written Evidence Submission to the Economy, Trade and Rural Affairs Committee inquiry: “Soil Health in Agriculture”**

Andrew Tuddenham, Head of Policy Cymru  
atuddenham@soilassociation.org

April 2025

## **About the Soil Association**

The Soil Association is a membership charity founded in 1946 by farmers, scientists, doctors, and nutritionists with a vision for good food produced with care for the natural world. Today, it develops and scales solutions for sustainable food and farming. Its Food for Life programme supports schools, hospitals, and caterers in shifting to healthy, sustainable diets. About 30% of primary schools in England are accredited. In Scotland, funded by the government, the programme now works with 18 of 32 local authorities to increase local and organic ingredients in school meals. In Wales, the Sustainable Food Places partnership, delivered by Food Sense Wales, promotes healthy, sustainable food in seven local authority areas. Soil Association Certification, our trading arm, works with over 6,000 businesses—farmers, growers, retailers, and manufacturers—in more than 50 countries, certifying over 14 million hectares of forest globally. A third of Wales’ organic farms are certified by Soil Association Certification.

## **Introduction**

Soil Association Cymru welcomes this inquiry and we are grateful for the opportunity to submit evidence. Soil health is central to resilient, productive farming and to tackling the climate, nature and health emergencies, but for far too long soil has been in the shadows of environmental policy when compared to air, water, and biodiversity. As such this crucial natural resource has been left relatively unprotected and undermeasured.

Welsh Government has made progress in building the knowledge base on Welsh soils, and there may be opportunities for soil protection, restoration and research through the Sustainable Farming Scheme. However, Wales lacks a legally binding soil health target and national soil strategy and action plan.

### **1. The role of soils in agricultural systems**

- 1.1** Healthy soils are essential to our ability to produce food, to control flooding and droughts and to limit the impacts of climate change.

- 1.2** The Food and Agriculture Organisation of the UN defines soil health as “the capacity of soil to function as a living system, with ecosystem and land use boundaries, to sustain plant and animal productivity, maintain or enhance water and air quality, and promote plant and animal health...”<sup>1</sup> The FAO also suggests that “a healthy soil does not pollute its environment and does contribute to mitigating climate change by maintaining or increasing its carbon content”.
- 1.3** Knowledge about soils and soil health remains incomplete, notably about the variety of soil life and its role in sustaining soils.
- 1.4** Arbuscular mycorrhizal fungi and soil bacteria support plant growth by improving soil structure and recycling nutrients. The fungi act as root extensions, boosting nutrient uptake and helping to bind soil.

## **2. The state of soils in agricultural systems**

- 2.1** In the last century, conversion of natural to agricultural ecosystems combined with detrimental practices such as deep and repetitive tillage, lack of organic amendments, overgrazing, monoculture and long bare-fallowing periods have caused the depletion of the Soil Organic Matter pool by 25%–75% across the globe<sup>2 3</sup>. This is the biggest issue for soils because organic matter is critical to soil health, biodiversity, productivity and carbon storage.
- 2.2** Particular risks to soil organisms and organic matter arising from farming practices that prevailed since the latter half of the 20th century include:
- 2.3** Over-application of synthetic fertilisers, which can reduce soil organic matter levels and increase soil acidity, reducing the habitat quality for soil organisms and the diversity of soil microorganisms. Reduced soil life and function affects crop growth, development and disease incidence. By reducing soil life synthetic fertilisers can create dependency as the soil loses its natural ability to supply nitrogen and other elements and nutrients to plants, whilst the excessive application of chemicals leach from soils, polluting environments near and far. The latest Environment and Rural Affairs Monitoring and Modelling Programme (ERAMMP) National Trends and Glastir Scheme evaluation Report (2025)<sup>4</sup> notes that the majority of improved grassland sites surveyed (72%) have “soil acidity levels which remain below the production threshold which is most likely linked to the continued use of synthetic fertiliser without the accompanying use of lime”.

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<sup>1</sup> [Plant Production and Protection Division: What is a healthy soil?](#)

<sup>2</sup> Lal, R., 2011. "Sequestering carbon in soils of agro-ecosystems," Food Policy, Elsevier, vol. 36 (Supplement), pages 33-39, January.

<sup>3</sup> Sanderman et al., (2017) [Soil carbon debt of 12,000 years of human land use](#), Proc. Natl. Acad. Sci. U. S. A., 114 (2017), pp. 9575-9580

<sup>4</sup> [Report 105. Wales National Trends and Glastir Evaluation.pdf](#)

**2.4** Repeated cultivations, physically disrupting the habitat for soil organisms and, by aerating the topsoil, accelerating the microbial breakdown of soil organic matter. One major cause for concern is the reduction in arbuscular mycorrhizal fungal diversity and biomass in UK soils. These are fungal networks associated with most crops that provide key benefits and are keystones within healthy soil communities.

**2.5** The prevalence of monoculture crops, which fail to provide the variety of conditions necessary for a diverse range of soil organisms to thrive.

**2.6** Pesticides that can kill not only the intended target, but also other beneficial organisms. Some pesticides are known to persist in soils, long after their intended use. This chemical contamination leads to a decrease in soil biodiversity.

**2.7** The latest ERAMMP National Trends and Glastir Scheme evaluation Report (2025)<sup>2</sup> data for soils indicates:

- stability in the national topsoil carbon concentration albeit an 8% loss in topsoil carbon concentration in arable and horticulture habitats
- 6-32% increase in soil compaction
- 4% of soils in Wales eroded or disturbed
- a 15% increase in phosphorus levels in improved grassland soils and three-fold increase in the number of improved grassland sites exceeding the leaching threshold for water quality
- a two-fold increase in the number of sites exceeding the leaching threshold for phosphorus in arable soils and a 7.7% loss of topsoil carbon
- 72% of improved grassland sites retain soil acidity levels below production thresholds

**2.8** The underlying driver of soil degradation in the UK has arguably been the specialisation and separation of arable and livestock production, in pursuit of ever cheaper commodity crops, but at great cost to the environment, health and animal welfare.

**2.9** Around 3.9 million hectares of farmland in England and Wales are at risk of compaction, largely due to late harvesting of crops (eg maize) and over-cultivation, which have disrupted traditional soil-regenerating practices.

**2.10** In eastern England, arable soils degrade as synthetic inputs replace organic matter and diverse crop rotations. Heavy machinery worsens compaction, affecting productivity, carbon storage, and flood resilience.

**2.11** In Wales and the west of England, intensive livestock farming produces more manure and slurry than soils can absorb. The Wye catchment sees over 6,000 tonnes of phosphorus annually, mainly from the rapidly growing poultry sector<sup>5</sup>.

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<sup>5</sup> [Re-focusing Phosphorus use in the Wye Catchment](#)

- 2.12** Manure phosphorus in the Wye catchment exceeds land needs by 45%, with the surplus polluting rivers and causing serious ecological harm.
- 2.13** In contrast to the risks to soil health associated with these farm types, organic farms have healthier soils. When compared to non-organic farms, organic farm soils perform significantly better against a range of soil health indicator. Long term studies have shown higher levels of soil microorganisms on organic farms compared with non-organic farmland<sup>6</sup> and organic farms have higher levels of soil organic matter<sup>7</sup>. They are also found to show better resilience against drought<sup>8</sup>.

### **3. Monitoring of soil health**

- 3.1** Despite an increasing interest in recent years, the existing data on soil health remains limited. Without data it is difficult to know where to start in order to protect and restore soils.
- 3.2** The data that does exist is fragmented and disjointed, as it is recorded by a variety of businesses and institutions, with different methods of soil sampling and analysis. Gaps in the publicly available data sets on Wales' varying soil types, functions and condition makes it difficult to measure progress or to establish a baseline for farmers to work with.
- 3.3** Much of the UK has been stuck for far too long in a circular bind, in which there are no agreed legally binding soil health improvement targets, due to insufficient data to establish a national baseline, and national soil monitoring schemes lack investment because soil health isn't prioritised relative to other focus areas like water, air and biodiversity with legally binding targets.
- 3.4** The European Union Soil Strategy for 2030 identified the lack of legislation as a key cause of soil decline in the EU. A 2023 directive will introduce mandatory soil health monitoring across all land types, covering chemical, physical, and biological properties. We discuss the need for legally binding soil targets to drive action in Wales in Section 6.
- 3.5** The Soil Association believes farmers have a key role to play in gathering data to help monitor soil health. Many are already doing so – as explored by various field labs within

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<sup>6</sup> Henneron, L et al. (2015) '[Fourteen years of evidence for positive effects of conservation agriculture and organic farming on soil life](#)', Agronomy for Sustainable Development, 2015, 35:1 169 – 181 doi:10.1007/s13593-014-0215-8.

<sup>7</sup> Tuomisto et al. (2012) Does organic farming reduce environmental impacts? A meta analysis of European research. Journal of Environmental Management, 112, December 2012, 309-320

<sup>8</sup> Muller et al. (2016) Organic farming, climate change and beyond. IFOAM EU and Fibl, p12: "organic farming systems are more resilient to changing weather conditions, such as extreme droughts and extreme rainfall."

the Innovative Farmers Programme (eg “Collective approach to improving soil health in the Orton Fells”<sup>9</sup>), which supports farmer-led research and innovation.

- 3.6** We believe that all farmers should know their soil health and how it compares to similar farms. With proper support, farmers can monitor and improve soil health, helping to fill gaps in our understanding of soils and uncover opportunities for funding and innovation. We provide views on the Sustainable Farming Scheme in section 5.
- 3.7** The Sustainable Soils Alliance recently identified<sup>10</sup> 26 soil metrics in use within 34 schemes or initiatives in widespread use by organisations and governments looking to influence or prescribe how farmers measure and assess their soil. For on-farm soil health monitoring to be most effective we urgently need a cohesive, standardised approach that will help join the dots between the various sectors involved – from farmers, to businesses, researchers, and policymakers.
- 3.8** The Global Farm Metric<sup>11</sup> developed by the Sustainable Food Trust provides a common framework for farm sustainability. The Soil Association partnered with the Global Farm Metric as official delivery partner in the UK, launching Soil Association Exchange<sup>12</sup> in 2022. The service helps farmers collect data on sustainability metrics like biodiversity, water, and soil health, to improve farm sustainability and access to new finance opportunities.
- 3.9** For soil health, Soil Association Exchange gathers data across nine metrics (soil organic matter, soil organic carbon stocks, bulk density, Visual Evaluation of Soil Structure, total Nitrogen and C:N balance, earthworms, soil cover %, pH, and contextual soil information)<sup>13</sup>
- 3.10** Remote sensing technology is emerging to help target areas for in-field assessment, and for in-field assessment to help refine remote sensing data<sup>14</sup>. Soil Association is a delivery partner in a Horizon Europe Framework Programme project to validate and develop soil health indicators. The project is creating an open access European-wide digital infrastructure, termed “AI4SoilHealth” . This infrastructure will be used for assessing and continuously monitoring soil health metrics by land use and/or management. A soil health measurement app is due to launch in 2026, and the UK pilot site is the UK Centre for Ecology & Hydrology’s (UKCEH) Plynlimon research catchment.

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<sup>9</sup> [Soil health in Westmorland Dales](#)

<sup>10</sup> [UK Soil Health Measurement Research.pdf](#)

<sup>11</sup> <https://www.globalfarmmetric.org/>

<sup>12</sup> [Profitable and sustainable farming | Soil Association Exchange](#)

<sup>13</sup> [21f3ea\\_5acb58c9b5724003bcb16c563fa808c6.pdf](#)

<sup>14</sup> [Soil mapping for precise land management | Farming Connect](#)

## 4. Classification of soils for land use

- 4.1** To date, 747 soil types have been identified in England and Wales, each with distinct properties shaped over geological time. These soils determine land productivity, influencing suitability for crops, livestock, and forestry, and play a key role in erosion, flood risk, and carbon storage.
- 4.2** We need a strategic approach to delivering the types of nature and climate friendly farming and the habitats that we need to avert the nature and climate crises and ensure food resilience.
- 4.3** We believe a land use framework informed by soil classification mapping is a key tool for shaping the policy needed to deliver this new approach to land. Soil Association has been calling for land use frameworks for years to give the clarity and confidence that nature-friendly farmers, land-users and progressive businesses need to invest in the future of the countryside.
- 4.4** It is therefore encouraging that Welsh Government Soils and Land Use Policy Team are considering the development of a soil functions and services map of Wales<sup>15</sup>.
- 4.5** Welsh Government’s “Soil function maps resource review” report of July 2024 states that “the aim of the map will be to provide best available information to support and balance land use decisions where trade-offs between soil functions and land use demands compete....The map will allow specialists and non-specialists to understand and quantify the impact of land use and policy decisions on a range of soil functions and services.”
- 4.6** Given that not all land is equally productive for food and that the way that land is farmed will determine whether Welsh Government can avoid unnecessary trade-offs between food, nature and climate we would also add that a soil function and services map must do more than merely guide land use change decisions, as a refinement of planning policy regarding the ‘best and most versatile land’ of ALC Grades 1-3a. A strategic approach to land use is needed to help target government support and regulation to encourage the farming *practices* or farm *types* that best match the carrying capacity or environmental vulnerabilities of the land.
- 4.7** On high yielding land, for example, regenerative practices and the use of ‘eco-infrastructure’ such as wildflower habitats, shelter belts and hedges can boost pollinators and pest control services to help sustainably optimise yields. Less productive land suits more extensive farming practices, including those which create and maintain semi-natural habitats, including meadows, heath, and wood pasture, which are critical for carbon sequestration and nature recovery. To tackle the nature and

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<sup>15</sup> [Soil function maps resource review](#), Welsh Government Soil Policy Evidence Programme 2023-24 report (July 2024)

climate crises, it is also critical to protect, restore and create woodlands, wetlands, and peatlands.

## **5. The policy and legislative mechanisms to protect soils and productive land (including the Sustainable Farming Scheme, National Minimum Standards and planning policy (amongst others))**

**5.1** To achieve healthy soils we need to focus on restoring multiple soil functions. This requires changes across the whole agricultural system. The Soil Association report, “Saving our Soils: healthy soils for climate, nature and health”<sup>16</sup> (2021) offers a suite of policy actions to support this:

**5.6** Provide clear incentives for farmers to monitor their soil health and improve it above their soil type baseline. Commit to a legally binding soil health target underpinned by properly funded national soil monitoring scheme.

**5.7** Support farmers to increase plant and animal matter being returned to soil through an increase in cover crops/green manures and a reintegration of grass-fed livestock. This then needs to connect with policies around nutrient pollution reduction.

**5.8** Increase incentives for farmers to increase use of minimum or no-till systems, along with support for drastically reduced pesticide use and conversion and maintenance of organic farming.

**5.9** Covering up bare soil – farmers should be supported to increase use of fertility-building green manures/cover crops, or the of the area under permanent grassland and longer leys, particularly on vulnerable soils. A strict regulatory baseline needs to be developed to keep vulnerable soils better covered. Monitoring should include a minimum percentage of bare soils at any time of year.

**5.10** Bring more trees into the farmed landscape – agroforestry systems protect soils from erosion by wind and water

**5.11** Reducing compaction - awareness of this issue should be raised amongst farmers via advisory services and written guidance, and baseline regulations should have compaction prevention as a clear standard.

**5.12** Designing crop rotations to improve soil health – longer and better rotations and intercropping should be incentivised alongside better support for farmers to move to niche and protein crops. New baseline regulations should help the transition away from basic rotations.

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<sup>16</sup> <https://www.soilassociation.org/media/24941/saving-our-soils-report-dec21.pdf>

### *Sustainable Farming Scheme*

- 5.13** Elements of many of the Soil Association's 'Saving our Soils' policy actions are contained in the Sustainable Farming Scheme: proposed scheme outline (2024).
- 5.14** With proper guidance and data safeguards, UA3: Soil Health Planning could create a valuable national soil dataset, benefiting the SFS and enhancing soil regulation. Farmers' concerns about data privacy must be addressed to encourage uptake of the SFS.
- 5.15** Soil test results will also require interpretation to ensure that appropriate management responses and potential SFS actions are identified. The SFS should provide guidance to help all farmers in the scheme understand soil structure and soil biology if these are assessed, and to signpost to further sources of advice and SFS Optional and Collaborative actions.
- 5.16** There is a clear need and opportunity to turn Universal layer plans and reports into actions, such as through the Optional and Collaborative layer. Without this, the level of ambition of a number of Universal actions will remain similar to regulatory baselines in Wales or elsewhere in the UK.
- 5.17** As such, alongside the need to 'ratchet up' their requirements over time, such as to include requirements to assess other indicators of soil health (eg earthworm numbers and a Visual Evaluation of Soil Structure), the overall effectiveness of the soil standards will rely on the ambition of other SFS requirements, and how the scheme is delivered as a whole. Payment rates and advisory support for practices like nutrient and pest management and support for organic farming will be crucial for promoting soil-focused farm practice.
- 5.18** Similarly, opportunities to reduce risks to vulnerable soils could be delivered by Universal Action 13: Tree Planting and Hedgerow Creation Opportunity Plan if guidance and mapping involves soil types and vulnerabilities, plus topography and potential nutrient and soil runoff pathways, to suggest parts of the farm where tree planting or hedgerow expansion could deliver benefits for soil health.
- 5.19** SFS support for organic farmers (and conversion to organic) will be crucial, particularly to provide support for farmers to transition to sustainable farming practices in catchments where soils and water are at risk from the cumulative impacts of agricultural intensification. We welcome the rollover of Organic Support Payment in 2025, but the sector needs clarity around what support will be available in the SFS in 2026.
- 5.20** Current soil health regulations mainly target individual issues in a fragmented manner. A 2020 study by the University of Sheffield and ADAS found that while farmers recognised the importance of sustainable soil management, few applied a wide range of practices

holistically. Since farms are complex systems, future soil regulations and SFS support will be more effective if delivered using a whole farm system approach.

**5.21** We suggest that further protection of soils in Wales could be achieved through SFS requirements towards maize growing, a high risk crop for soil erosion. The Agriculture and Horticulture Development Board (AHDB) notes that much of Wales is regarded as marginal for maize growing, being wetter and more exposed than much of England.

#### *National Minimum Standards*

**5.22** We believe the current regulatory framework across Wales is too fragmented and we supported the Agriculture White Paper (2020) proposals to consolidate existing legislation under a set of National Minimum Standards (NMS), applicable to all farmers and land managers in Wales regardless of whether they choose to enter the SFS. This will provide a level playing field across Wales and will ensure that the SFS is not undermined by farming businesses that are not participating.

**5.23** We wish to see a commitment to develop an NMS framework. There are potential risks to soils, water, and biodiversity arising from further intensification of agriculture if farmers choose not to participate in the SFS. Furthermore, value for public money is reduced if SLM gains secured through scheme payments are offset by regulatory failure to control damaging practices or pollution on the same farm or elsewhere.

**5.24** Within the Basic Payment Scheme's Cross Compliance framework a regulatory baseline for soil is provided by Good Agricultural and Environmental Conditions (GAEC). GAECs 4 (minimum soil cover), GAEC 5 (managing land to limit soil erosion) and GAEC 6 (maintenance of soil organic matter) represent the minimum standards of protection against soil loss and damage to soil health. We support recommendation 6 of the recently published statutory review of the Control of Agricultural Pollution Regulations: 2025 to bring GAEC 5 (managing land to limit soil erosion) into regulation within 18 months. However, GAEC 4 (minimum soil cover) is a non-statutory standard and gains function from Cross Compliance. GAEC 4 should be brought into the SFS and subsequently into NMS (alongside other soil-related regulation) to maintain protection against soil loss across Wales.

## **6. The potential for legal frameworks and targets for soils**

**6.1** Welsh Government's support for the Global Biodiversity Framework requires cutting nutrient losses to the environment by half and pesticide losses by two-thirds by 2030. While the SFS may help, Wales lacks a binding soil health target and national soil strategy to drive lasting progress.

**6.2** It is welcome that Welsh Government have invested in soil monitoring in the last 10 years through the Environment and Rural Affairs Monitoring and Modelling Programme

and have established a Soil policy evidence programme to review evidence of the condition of Welsh soil and how agricultural practice is affecting it.

- 6.3 Wales does not yet have a dedicated soil strategy and soil action plan. The publication timeline for Welsh Government’s Soil Policy Statement is currently unclear. The statement will set out Welsh Government’s “vision for the sustainable management of agricultural soils for future generations”<sup>17</sup>.
- 6.4 We suggest an overarching vision should refer to all soil, acknowledging the importance of soil in urban and non-agricultural locations. These soils are often overlooked by policy, and due to lack of knowledge and understanding by managers are at risk of degradation.
- 6.5 The Well-being of Future Generations Act national indicator for 'Concentration of carbon and organic matter in soil,' is a key metric, as it reflects soil health, fertility, and its ability to sequester carbon, thus contributing to climate change mitigation.
- 6.6 However, Well-being indicators and a Soil Policy Statement alone are not enough. A comprehensive soil strategy and action plan that includes the policy, monitoring and investment is required to ensure that all soils in Wales are managed in a way that improves their health and productivity, supports biodiversity, and contributes to climate change mitigation.
- 6.7 Section 4 of the Agriculture (Wales) Act 2023 requires the Welsh Ministers to prepare and publish indicators and targets to measure progress towards achieving the SLM objectives. We would like to see a soil health target and indicators included in this suite.

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<sup>17</sup> [Soil management | GOV.WALES](https://gov.wales/soil-management)

## Soil Health in Agriculture

NFFN Cymru's response to the Senedd's [Economy, Trade, and Rural Affairs Committee](#) inquiry into [soil health and agriculture](#).

### Key Points

- Healthy soils provide **multiple benefits** for food production, the environment and wider economy, whilst poor soil health has a **negative impact**.
- Welsh soils face **numerous threats** and have witnessed recent **negative trends**.
- Soil health **monitoring** should include physical and biological properties alongside chemical analysis to ensure the long-term resilience of agricultural systems.
- The **Sustainable Farming Scheme (SFS)** must support and reward farmers to implement regenerative farming techniques and nature-based interventions to improve soil health.
- The importance of **advice and guidance** for farmers to improve soil health is paramount for the successful transition towards more sustainable and resilient agricultural systems.
- While standalone **soil health legislation** is a future possibility, strengthening existing environmental **regulations** and embedding soil health more firmly within agricultural **support** mechanisms are likely near-term pathways.
- There are strong arguments for **establishing targets** for agricultural soil health in Wales, however there are considerations and challenges that need addressing.

### 1. The role and state of soils in agricultural systems

Agricultural soils are of vital importance and provide a host of services and benefits.<sup>1</sup>

- **Foundation for Food Production:** Soils provide the essential medium for plant growth, supplying water, nutrients, and physical support for crops and grasslands which underpin livestock farming.
- **Nutrient Cycling:** Healthy soils are vital for the natural cycling of nutrients, making them available to plants and reducing the need for synthetic fertilizers.
- **Water Regulation:** Soils play a key role in storing and filtering water, influencing water availability for plants and helping to regulate water flow, reducing the risk of flooding and drought.
- **Carbon Storage:** Agricultural soils, particularly grasslands and peat-rich areas, are significant carbon sinks, playing a crucial role in climate change mitigation by storing atmospheric carbon.
- **Biodiversity Support:** Soils are a habitat for a vast array of organisms, from microbes to invertebrates, which contribute to soil health and ecosystem functioning.
- **Supporting Ecosystem Services:** Healthy agricultural soils contribute to broader ecosystem services such as clean water and air.

Whilst there are positive aspects to agricultural soil health in Wales, our soils face numerous threats and have witnessed recent negative trends.

#### Positive aspects:<sup>2</sup>

- **High Soil Organic Carbon (SOC):** Welsh agricultural soils, particularly under permanent grassland and peat, tend to have higher levels of SOC compared to the European average. This is beneficial for carbon storage and overall soil health.
- **Grassland Dominance:** Most of Wales' agricultural land is permanent grassland, which is generally considered to be at a lower risk of soil degradation compared to arable land.
- **Stable Soil Carbon in Improved Land:** Data suggests that soil carbon levels in improved grassland have remained stable over the past 30 years.

#### Negative aspects:

- **Soil quality:** Has deteriorated across all habitats apart from woodlands where there has been some improvement.<sup>3</sup>
- **Peatlands:** While important for carbon storage, drained or degraded peatlands can be a source of greenhouse gas emissions. 75% of peatlands have in some way been impacted, turning them from carbon sinks to carbon sources.<sup>2</sup>
- The latest ERAMMP National Trends and Glastir Scheme Evaluation Report highlights soil health concerns in Wales;<sup>4</sup>
  - A 2 to 4 fold increase in the number of improved soils with nutrient levels above recommended levels risking leaching to water courses. 8% in arable and 17% of improved soils now exceed the recommended levels.
  - 8% decrease in topsoil carbon concentration in arable soils
  - A 6-32% increase in soil compaction reducing resilience to drought, increasing risk of both rapid runoff and nitrous oxide emissions – the latter a potent greenhouse gas.
  - 72% of Improved Grassland sites fall below the minimum soil acidity levels when productivity may be reduced
  - The Glastir agri-environment had few positive benefits for soil with a couple of exceptions including an increase in topsoil carbon concentrations in 3 of the 19 habitats
- **Economic impacts:** The annual cost of soil degradation in England and Wales is an estimated £1.2 billion. This is mainly linked to loss of organic content of soils (47% of the total cost), compaction (39%) and erosion (12%).<sup>5</sup>

#### Identified threats and areas of concern:<sup>6</sup>

- **Compaction:** Around 40% of Welsh soils are considered potentially vulnerable to compaction. Damage from heavy machinery and livestock, on intensively managed grasslands or even in set-stocked extensive systems, and during wet conditions, is a significant threat. This can reduce water infiltration (contributing towards flooding), aeration, root growth and thus yield.
- **Erosion:** About 7% of Wales' land is susceptible to high erosion rates, and this risk is greatest during high intensity rainfall events. This leads to loss of topsoil and nutrients, and can negatively impact water quality. There is overall a low risk of soil erosion, however erosion is highly localised and intense resulting in hotspots where significant soil loss can occur.

- **Loss of Soil Organic Matter (SOM):** Levels are a key indicator of soil health. While generally stable in Wales according to recent data, maintaining and enhancing SOC is crucial for long-term soil health and carbon sequestration.
- **Land Use Change:** Conversion of permanent grassland to other uses can negatively affect soil properties.
- **Agricultural Intensification:** The main pressures and threats to soil biodiversity are the intensification or higher productivity systems using higher inputs (such as synthetic fertilisers, pesticides, sewage sludge and herbicides),<sup>7</sup> whilst carbon losses may be caused by intensification of the management of grassland.<sup>8</sup>
- **Climate Change:** Predicted to impact soil wetness, carbon, biology, compaction, erosion, and overall agricultural capability.

To conclude, while a significant portion of agricultural soils in Wales are currently in good condition, there are specific threats and areas where improvement is needed. Maintaining and enhancing soil health is crucial for the sustainability of Welsh agriculture, its contribution to environmental goals, and its resilience to climate change.

## 2. Monitoring of soil health

Traditional soil analysis packages measure;

- pH: measures the acidity or alkalinity of the soil
- Available Phosphorus (P)
- Available Potassium (K)
- Available Magnesium (Mg)

These elements are essential to optimize crop and pasture growth. This information is important for farmers to make informed decisions about fertilizer application, ensuring that crops receive the nutrients they need without over-fertilizing, which can be detrimental to the environment.

However, standard soil testing provides an incomplete picture of soil health as these tests measure the *plant-available* or *extractable* portion of nutrients, which is a small fraction of the total amount present in the soil. As such farmers are often advised to achieve optimum soil nutrient levels by applying synthetic inputs (N, P, K). This feeds the *plant*, rather than feeding the *soil*. However farmers can significantly improve their soil health without relying on external inputs by focusing on regenerative agriculture principles and nature-based solutions (this is explored further in section 4). Healthy soils, characterized by a diverse community of microorganisms, well-developed soil structure, and adequate organic matter content, create an environment where insoluble macronutrients like phosphorus and potassium can be effectively mobilized and taken up by plants.<sup>10, 11, 12, 13</sup> This highlights the importance of maintaining and improving soil health for sustainable plant nutrition and reducing the reliance on external inputs.

As our understanding of soil health evolves, there's a growing recognition that focusing solely on these soluble nutrient forms is insufficient. A more holistic assessment requires incorporating physical and biological assessments.

- **[Visual Evaluation of Soil Structure \(V ESS\)](#):** This relatively simple, on-farm assessment provides a rapid indication of soil structural quality, identifying issues like compaction, poor aggregation, and anaerobic conditions. Training and resources are needed to enable widespread farmer adoption.

- [Water Infiltration Test](#): Simple field tests to measure how quickly water soaks into the soil can indicate structural issues and water-holding capacity.
- [Earthworm Counts and Diversity](#): Earthworms are key indicators of soil biological health. Simple field counts can be conducted by farmers, and more detailed diversity assessments can be done in the lab.
- [Bulk Density and Porosity](#): Measuring the weight of a known volume of soil (bulk density) and calculating the pore space provides insights into compaction and aeration. This could be incorporated into standard soil testing packages.
- [Soil Respiration](#): Measuring the rate of carbon dioxide release from the soil indicates microbial activity and overall biological function. Lab-based methods exist, and simpler field kits are becoming available
- [Aggregate Stability](#): This assesses how well soil aggregates hold together when subjected to water or physical stress, which is crucial for understanding erosion risk and water movement.

In conclusion, while traditional soil testing and monitoring in Wales is useful, it doesn't provide a complete picture. By integrating physical and biological assessments alongside traditional chemical analyses, leveraging technology, empowering farmers with knowledge and tools, and creating supportive policy frameworks, we can gain a much richer understanding of our soil resources and work towards more sustainable and resilient farming systems.

### 3. Classification of soils for land use

The Agricultural Land Classification (ALC) system, which Wales shares with England, is the main framework for classifying agricultural land quality. Its primary function is to assess the long-term limitations of land for agricultural use based on physical and chemical characteristics.<sup>14</sup> Land is classified into five grades, with Grade 1 being the best quality and Grade 5 the poorest:

**Grade 1:** Excellent quality agricultural land with very few limitations.

**Grade 2:** Good quality agricultural land with slight limitations.

**Grade 3a:** Good to moderate quality agricultural land.

**Grade 3b:** Moderate quality agricultural land.

**Grade 4:** Poor quality agricultural land with moderate limitations.

**Grade 5:** Very poor quality agricultural land with severe limitations, often suitable only for permanent pasture or rough grazing.

There are many positives to this approach, particularly for its role in strategic land use planning and protecting higher quality agricultural land from development. It is also a well-established and understood system within the planning and agricultural sectors.

However, there are limitations to this approach.<sup>15</sup>

- **Outdated Climate Data:** A significant criticism is that the climate data used in the ALC dates back to 1941-1980 and doesn't account for recent climate change impacts, potentially overestimating the quality of some land.

- **Limited Scope:** The ALC primarily focuses on the inherent physical limitations for agricultural production and doesn't fully integrate aspects like soil health (biological and physical properties beyond structure and texture), carbon sequestration potential, or other ecosystem services beyond food production.
- **Generalised Maps:** Predictive ALC maps provide a strategic overview but aren't accurate enough for site-specific assessments, requiring detailed surveys for planning applications.

For modern agricultural needs with increasing focus on sustainable agriculture, climate resilience, and soil health, the ALC's limitations in these areas become more apparent. There's a growing need for a more integrated approach to soil assessment that considers a wider range of soil functions. To be more fit for purpose in the context of modern agricultural and environmental challenges, there's a need to complement the ALC with enhanced monitoring and assessment of physical and biological soil health indicators. Integrating these aspects into future policy and potentially refining the ALC system itself would provide a more holistic understanding of Wales' soil resources and support more sustainable land management decisions.

#### 4. The policy and legislative mechanisms to protect soils and productive land

While Wales currently lacks specific, standalone legislation solely dedicated to soil health, soil is protected through a combination of environmental regulations and the framework of agricultural support schemes.

1. **The Agriculture (Wales) Act 2023** is a significant piece of legislation that lays the groundwork for protecting soils in Wales, although it doesn't contain specific, direct regulations solely focused on soil health in the same way as air or water. The effectiveness of this protection will depend on the detailed implementation of the SFS and the ambition of the indicators and targets set by the Welsh Government
2. **The Sustainable Farming Scheme (SFS):** While not strictly a regulatory framework, it aims to incentivize farmers to adopt practices that deliver environmental benefits, including soil health.
3. **The Water Resources (Control of Agricultural Pollution) (Wales) Regulations 2021:** This piece of legislation is aimed at preventing water pollution from agricultural sources. While the primary focus is water quality, it has implications for soil health.
4. **Environment (Wales) Act 2016:** This Act promotes the sustainable management of natural resources, which includes soil. It places a duty on public bodies to maintain and enhance biodiversity and promote the resilience of ecosystems, which are intrinsically linked to healthy soils.
5. **Well-being of Future Generations (Wales) Act 2015:** This Act sets out seven well-being goals for Wales, including a "Resilient Wales" which emphasizes maintaining and enhancing a biodiverse natural environment with healthy functioning ecosystems. Soil health is a fundamental component of this goal. The Act also includes a national indicator on the "*concentration of carbon and organic matter in soil*," highlighting its importance.

The Welsh Government has undertaken evidence reviews on soil and is developing a draft soil policy statement,<sup>16,17</sup> which could pave the way for more targeted legislation or regulations in the future. However, while standalone soil health legislation is a future possibility, strengthening existing environmental regulations and embedding soil health more firmly within agricultural support mechanisms are likely near-term pathways. The ongoing development and implementation of the SFS in Wales will play a key role in shaping the future management and state of agricultural soils in the country. Ensuring that the SFS provides sufficient incentives and support for farmers to adopt comprehensive soil health management practices will be crucial.

### ***Nature Based Solutions for Soil Health***

The SFS must support and appropriately fund farmers to implement nature-based interventions and management techniques to improve soil health.<sup>18</sup>

- **Planting cover crops:** Cover crops enhance soil health by increasing organic matter, improving soil structure, promoting nutrient cycling, and reducing erosion.<sup>19, 20</sup>
- **Pasture species diversity:** Higher plant diversity in grasslands is associated with improved soil measures, including soil moisture, carbon, nutrient recycling and uptake, and biodiversity.<sup>21, 22, 23, 24</sup>
- **Regenerative grazing:** Strategically managing grazing and rest periods, often referred to as rotational or mob grazing means that plant roots grow deeper, increasing soil organic matter, improving soil structure, and enhancing water infiltration.<sup>25, 26, 27</sup>
- **Agroforestry:** By integrating trees into agricultural systems, farmers can enhance soil structure, fertility, and water infiltration, while also reducing soil erosion.<sup>28, 29, 30</sup>
- **Organic fertilizers and Composting:** This significantly benefits soil health by increasing soil organic matter, improving structure, and enhancing biological activity. This leads to better nutrient availability, water retention, and overall soil resilience.<sup>31, 32, 33</sup>

Importantly, these nature-based solutions can help farmers reduce reliance on bought in inputs such as feed and synthetic fertilizers, reducing costs and reducing environmental impacts.

### ***Soil Health Planning and Monitoring***

While soil testing requirements under the SFS Universal Layer proposes to focus on potassium (K), Phosphorous (P), Magnesium (Mg), pH and soil organic matter; higher-tier actions could incentivize farmers to undertake more comprehensive soil health assessments that include physical and biological indicators, as discussed in the previous answer. As the SFS evolves, specific Optional or Collaborative actions that demonstrate significant soil health benefits could, over time, become prerequisites to entering the SFS Universal Layer, particularly if their uptake is insufficient to meet national goals.

Farmers will need training and accessible resources (field guides, online tools, workshops) to confidently conduct visual assessments and simple biological tests, as well as interpreting the results. The data collected from careful observation of soil structure, water infiltration, and plant health through enhanced monitoring are essential for making informed management decisions and tracking the impact of different practices on overall soil health.

### **Advice and Guidance**

Many of the sustainable farming practices promoted by the SFS (e.g., soil health management, agroforestry, precision nutrient management, biodiversity enhancement) require specific knowledge and skills. Access to expert advice will be vital for farmers to implement these practices correctly and achieve the desired outcomes for soil health. Furthermore, it often takes time for soil health to improve significantly, and farmers may need support and patience during the transition. Soil health is a multifaceted concept encompassing biological, chemical, and physical properties, and many farmers may not have a comprehensive understanding of these interactions and how their management practices impact them. Advice can demystify these complexities and highlight the importance of a holistic approach.

- **Best Practice Guidance:** Advice services can provide up-to-date information on the most effective and efficient ways to implement sustainable soil health practices, drawing on research and practical experience.
- **Tailored Advice:** Farms in Wales are diverse in terms of size, type, and environmental context. Generic advice may not always be sufficient. What works on a lowland dairy farm may not be suitable for an upland sheep farm. Tailored guidance, considering individual farm circumstances, will be crucial for successful implementation
- **Learning from Experience:** Guidance can facilitate knowledge exchange and peer-to-peer learning, allowing farmers to benefit from the experiences of others who have successfully improved their soil health
- **Problem Solving:** As farmers adopt new practices, they may encounter challenges. Access to advice can provide solutions and support to overcome these hurdles.
- **Regenerative and nature-based interventions:** As mentioned previously, soil health advice often recommends applying synthetic fertilizers to reach target nutrient levels for specific crops or grassland. Advice should shift towards a more integrated approach that considers soil health more broadly, incorporating aforementioned regenerative farming techniques and nature-based interventions.

The importance of advice and guidance for farmers to improve soil health in Wales is paramount for the successful transition towards more sustainable and resilient agricultural systems. Without this crucial support, the widespread adoption of soil health-enhancing practices and the achievement of national environmental goals will be significantly hindered.

### **5. The potential for legal frameworks and targets for soils.**

While explicit, legally binding targets for agricultural soils across Wales are not yet fully defined, the framework is in place for their potential development in the future. The Agriculture (Wales) Act 2023 provides a strong legal foundation for prioritizing sustainable land management, including soil health. The five-yearly Sustainable Land Management reports mandated by the Act could set out broader targets for soil health across Wales based on collected data and progress towards the SLM objectives.

There are strong arguments for establishing targets for agricultural soil health in Wales:

- **Measures Progress:** Quantifiable targets allow for the monitoring of soil health improvements or declines over time, enabling the assessment of policy effectiveness and the identification of areas needing more attention.
- **Informs Policy and Funding:** Targets can help justify and direct funding for soil health initiatives within the SFS and other relevant policies.
- **Drives Farmer Engagement:** Well-defined and achievable targets, coupled with appropriate advice and support, can motivate farmers to adopt soil-friendly practices. The proposed SFS with its universal soil testing requirement could provide a baseline for future target setting.

However there are considerations and challenges in setting soil health targets.

- **Complexity of Soil Health:** Soil health is influenced by numerous interacting factors (physical, chemical, and biological), making it challenging to define and measure with single, simple targets. A suite of indicators may be necessary.
- **Spatial Variability:** Soil types, climate, and land management practices vary significantly across Wales, meaning that uniform national targets may not be appropriate. Regional or soil-type specific targets might be needed.
- **Data Availability and Monitoring:** Robust and consistent data on soil health across Wales is crucial for setting meaningful targets and tracking progress. While ERAMMP provides valuable data, more comprehensive and farm-level data collection may be required. The SFS's soil testing could contribute to this.
- **Farmer Acceptance and Practicality:** Targets need to be realistic, achievable, and developed in consultation with farmers to ensure buy-in and practical implementation.

If targets were to be implemented, they could focus on various aspects of soil health, such as:

- **Soil Organic Matter (SOM):** Increasing SOM levels across different agricultural land types. Indicator 13 of the Well-being of Future Generations (Wales) Act 2015 already monitors the concentration of carbon and organic matter in soil, providing a foundation for more specific targets.
- **Soil Structure:** Improving indicators of soil structure, such as aggregate stability and visual evaluation scores (VESS).
- **Soil Biodiversity:** Monitoring earthworm populations or other indicators of soil biological activity.
- **Nutrient Management:** Reducing nutrient surpluses and improving nutrient use efficiency.
- **Soil Erosion:** Reducing the rate of soil loss from agricultural land.
- **Soil Compaction:** Decreasing the area of agricultural land affected by compaction.

The ongoing development of the SFS provides a key opportunity to integrate soil health considerations and potentially lay the groundwork for future target setting, building upon existing monitoring efforts and the knowledge gained through the scheme's implementation.

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## Farmers' Union of Wales response to a Senedd Economy, Trade and Rural Affairs Committee inquiry on soil health in agriculture

11th April 2025

### **About the FUW**

The Farmers' Union of Wales (FUW) was established in 1955 to exclusively represent the interests of farmers in Wales. Since 1978 the union has been formally recognised by UK Governments, and subsequently by Welsh Governments, as independently representing those interests.

The FUW's Vision is *thriving, sustainable, family farms in Wales*, while the Mission of the Union is *To advance and protect Wales' family farms, both nationally and individually*, in order to fulfil the Union's vision.

In addition to its Head Office, which has thirty full-time members of staff, the FUW Group has around 80 members of staff based in twelve regional offices around Wales providing a broad range of services for members.

The FUW is a democratic organisation, with policies being formulated following consultation with its twelve County Executive Committees and eleven Standing Committees.

### **General comments**

The majority of the themes covered by this inquiry are addressed by the FUW's response to a Welsh Government consultation on its Draft Soil Policy Statement in 2022 (Appendix 1). Therefore, in addition to the further comments below, we would refer members of the Committee to Appendix 1 as well as the Soil Carbon and Baseline recommendations of the Sustainable Farming Scheme Carbon Sequestration Panel summary.<sup>1</sup> The full report is expected to be published on the Welsh Government website ahead of the committee's oral evidence sessions.

### **The role and state of soils in agricultural systems**

Farmers in Wales manage a range of different soil types, even within their own farming systems. Soils themselves are influenced to varying degrees by previous and current management practices, underlying geology, soil structure, microbiota, weather, and increasingly, climate change. Furthermore, different soils can react differently to management practices, making

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<sup>1</sup> [Sustainable Farming Scheme: Carbon Sequestration Evidence Review Panel: summary report | GOV.WALES](https://gov.wales/sustainable-farming-scheme-carbon-sequestration-evidence-review-panel-summary-report)

standardised policies, measuring and management techniques difficult (for example, the impact of tree planting on organo-mineral soils and sandy soils' soil carbon content).

**Figure 1: An overview of Wales by a) land cover [1], b) agricultural land classification land quality (Predictive ALC Version 2) [2], c) elevation [1] and d) major soil groups [3].**

MMH is 'mountain, moorland and heath'; BMV stands for 'Best and Most Versatile' land; SW is 'surface water' and GW is 'ground water'.



*Figure 1 (taken from the Welsh Government's review of evidence on Welsh soils).<sup>2</sup>*

There is an estimated 410 Megatonnes of carbon stored in Welsh soils<sup>3</sup>. Whilst farmers in Wales manage soils ranging from arable land to peatland, the vast majority of farmland use is permanent pasture or upland rough grazing. This often-undervalued habitat acts as a huge soil organic carbon store in Wales (SOC)<sup>4</sup>, subject to very little disturbance in comparison to land used for arable, horticulture, forestry or development purposes. Yet, current private carbon sales only value 'new and additional' sequestration<sup>5,6</sup>, and payments are often higher for creating new

<sup>2</sup> [Welsh Soil Evidence Review](#)

<sup>3</sup> Russell, S., Blackstock, T., Christie, M., Clarke, M., Davies, K., Duigan, C., Durance, I., Elliot, R., Evans, H., Falzon, C., Frost, R., Ginley, S., Hockley, N., Hourahane, S., Jones, B., Jones, L., Korn, J., Ogden, P., Pagella, S., Pagella, T., Pawson, B., Reynolds, B., Robinson, D., Sanderson, B., Sherry, J., Skates, J., Small, E., Spence, B. and Thomas, C. (2011). Chapter 20: Status and Changes in the UK's Ecosystems and their Services to Society: Wales. UK National Ecosystem Assessment: Technical Report. [Assessment of Welsh Soil Issues in Context](#)

<sup>4</sup> [Welsh Soil Evidence Review](#)

<sup>5</sup> [Regenerate Outcomes](#)

<sup>6</sup> [Getting paid for carbon](#)

habitat through Government schemes, as opposed to valuing existing carbon stocks, their protection and enhancement. This means farming practices which have protected and maintained their soil carbon stores (and habitat value) are often at a disadvantage for obtaining further funding.

This lack of disturbance and sustainable management through livestock is reflected in recent research compiled by the Welsh Government's Environment and Rural Affairs Monitoring and Modelling Programme (ERAMMP), which demonstrated no changes in national topsoil carbon<sup>7</sup>, in contrast to England. However there was a loss within Arable soils (-7.7%). Arable farmland in England is now seeking the re-integration of livestock to restore their soil organic matter levels<sup>8</sup>.

The importance of soil health (particularly soil organic matter- SOM) for providing multiple benefits cannot be understated. It impacts our ability to produce food, recycle nutrients, filtrate water, store carbon, and support biodiversity. However, there is a shift underway within agricultural practices, as the science and understanding around the biological element of soils is developing, alongside how management techniques can directly and indirectly influence these factors. Historic policies and agricultural businesses have focused on dramatically increasing production via chemical means (artificial fertilisers). However, both the scientific and practical implications of the role of mycorrhizal fungi, SOM, root exudates, the sustainable use of inputs and the impact of grazing management and rest on soil health, soil carbon and achieving optimum productivity is now increasingly understood.

The high costs and market volatility of manufactured fertilisers, the direction of agricultural support policies, and an uplift in farmer to farmer knowledge exchange<sup>9,10,11</sup>, alongside biological soil consultants is enabling this shift.

This means the adoption of both new and old management techniques such as no or minimum tillage, ensuring diversity of species and deep rooting plants, mob/cell/holistic planned grazing, consideration of anthelmintic use, and overwintering or bale grazing.

The vast majority of Welsh farmland inadvertently follow the five rules of 'regenerative agriculture'<sup>12</sup> - don't disturb the soil, keep the soil surface covered, keep living roots in the soil (depending on the grazing implemented), grow a diverse range of crops (unimproved or semi-natural grasslands have the highest diversity, unless abandoned<sup>13</sup>) and integrate livestock. However, the supply chain and Government-led schemes still lack recognition and reward for ensuring the long term viability and good health of soils. Soil health is a long term investment, however, short tenures, annual Government funding cycles and pressure on tight profit margins makes this long term vision, and implementation, challenging to balance against annual

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<https://erammp.wales/sites/default/files/2025-03/Report%20105.%20Wales%20National%20Trends%20and%20Glastir%20Evaluation.pdf>

<sup>8</sup> [https://www.soilassociation.org/media/25271/sa\\_ex-livestock\\_3\\_web.pdf](https://www.soilassociation.org/media/25271/sa_ex-livestock_3_web.pdf)

<sup>9</sup> [Pasture for Life](#)

<sup>10</sup> [Regenerative agriculture training, webinars and course in the UK — Regenerate Outcomes](#)

<sup>11</sup> [Da Byw](#)

<sup>12</sup> [Principles of Regenerative Agriculture - Groundswell](#)

<sup>13</sup> [Species-rich grasslands management - Farming for Nature](#)

profitability, in addition to understanding the complexities of soil carbon.

## **Monitoring of soil health**

There is a huge array of soil modelling, research and papers written on Welsh soils via the ERAMMP and Soil Policy Evidence Programme.<sup>14,15,16</sup>

Yet, the vast majority of this data and detail is not communicated back to the farmers managing these soils, representing a missed opportunity for engagement, knowledge sharing and monitoring. However, accurate and cost-effective monitoring of soil carbon through comparable and repeatable measurements is challenging at the farm-level.

The engagement potential is illustrated well in Northern Ireland's Soil nutrient Health Scheme. The largest baseline soil sampling programme ever undertaken has had a 92% farmer uptake, in part due to the delivery of farm-level, and field-level soil data on fertility and carbon stocks, with accompanying LIDAR run-off risk maps and above-ground biomass maps.<sup>17</sup>

The Carbon Panel recommended that Welsh Government makes improvements to its soils monitoring programme to ensure it meets United Nations Framework Convention on Climate Change (UNFCCC) compliant standards to assess soil carbon to a minimum of 30cm, (as opposed to 15cm) recognising that good practice involves sampling to 1m or the bedrock.

Farming Connect currently have an ongoing Welsh Soil project, seeking to understand the carbon content of soils under different management intensity across Wales<sup>18</sup>, using a selection of the demonstration network farms. However, comparing averages can be challenging as was reflected in a First Milk and University of Leeds study. The study showed carbon stocks in permanent pastures varying from 35-350 tonnes of Carbon per hectare<sup>19</sup>.

Soil sampling has been supported via various Government-led schemes, including Farming Connect. Farmers also pay for their own soil sampling to ensure lime, slurry and fertiliser applications are optimal, or to identify mineral deficiencies which may impact on livestock health. However, the results collected through Government-funded schemes are not noted against fields or farms<sup>20</sup> (such as on RPW Online) due to data sharing technicalities, but rather compiled according to geographical area. They have historically included nutrient indices tests only (P, K & Mg, and also pH), but are now being expanded to incorporate biological factors such as soil organic matter and structure.

The soil testing of field parcels that receive inputs is proposed as a Universal Action within the upcoming Sustainable Farming Scheme (SFS).

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<sup>14</sup> [Soil & Peat | ERAMMP](#)

<sup>15</sup> [Soil function maps resource review](#)

<sup>16</sup> [Soils | Sub-topic | GOV.WALES](#)

<sup>17</sup> [Soil Nutrient Health Scheme | Agri-Food and Biosciences Institute](#)

<sup>18</sup> [Farming Connect Demonstration Network - Welsh Soil Project](#)

<sup>19</sup> [On farm carbon capture - Knowledge Transfer Partnerships](#)

<sup>20</sup> [Summary of Farming Connect Soil Results 2023/2024](#)

New markets and companies are taking advantage of this appetite from farmers to understand their soils, particularly carbon levels and the ability to increase (or decrease) their levels, via sales from soil carbon credits. Examples include Agreeena, Soil Capital, Trinity AgTech and Regenerate Outcomes - but many will take a significant cut of any credits generated, both in order to pay for the soil carbon baselining and monitoring, in addition to profit.

Applications (paid for) are also available to guide farmers through soil sampling and monitoring, such as Soil mentor<sup>21</sup>, which allow you to plot results, observations and photos against GPS field locations, and to benchmark them against other farms. However, at current prices, they are not widespread or widely used.

Soil structure can also be assessed by farmers via the 'Visual Evaluation of Soil Structure'<sup>22</sup> steps, simply using a spade out in the field. Worm count tests can also be done in the field, which give a good indication of organic matter<sup>23</sup>.

## **Classification of soils for land use**

*(Please see the Soils Policy Statement response)*

The FUW endorses the need to protect agricultural soils classified as the Best and Most Versatile (BMV) for sustainable food production, given the challenge of conflicting profitability of different land uses, long term food security, and the increase in population predicted over the next decades, amid increasingly unstable geo-political trade.

However, other grades of land should not be disregarded or left unprotected for food production. Climate change is adding increasing stress to soil health on all types of land, particularly arable land which is generally classified as BMV. This is due to challenging growing conditions and extreme weather, which causes increased compaction or the loss of microbial activity due to drought, or increased levels of pests and pathogens from warmer, wetter weather. This will increase the need for other grades of land to 'fill the gap', whilst delivering on various other land use demands such as biodiversity, energy generation, carbon sequestration and development.

It should also be recognised that using land classifications can often be a blunt tool for determining the appropriateness of certain land areas for other uses such as tree planting or development. The FUW has previously questioned the Welsh Government's intentions to plant 'less productive areas' of Wales with trees given that the areas of Wales categorised as Less Favoured Areas (LFA) and Severely Disadvantaged Areas (SDA) are 79% and 56% respectively, and therefore for many farming business the entire farming system will consist of land classified as Grade 3 or lower. When determining the appropriateness of different land

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<sup>21</sup> [Soilmentor](#)

<sup>22</sup> <https://ahdb.org.uk/knowledge-library/how-to-assess-soil-structure>

<sup>23</sup> <https://soils.vidacycle.com/soil-tests/1-1-earthworms/>

areas for other agricultural or non-agricultural purposes, the FUW maintains that socio-economic and wider environmental factors must also be considered on an equal basis.

**The policy and legislative mechanisms to protect soils and productive land (including the Sustainable Farming Scheme, National Minimum Standards and planning policy (amongst others))**

**The potential for legal frameworks and targets for soils**

*(Please see the Soils Policy Statement response for an outline of existing policy and legislative mechanisms farmers work within)*

A singular Soil Carbon Code<sup>24</sup> is desperately needed, to standardise measuring, modelling, permanence requirements and provide governance around selling Carbon credits from soils. The soil carbon credit market is still considered somewhat of a 'Wild West', whereas there are established codes for Woodlands and Peatlands. Yet, it offers a unique opportunity for farmers to increase carbon sequestration, implement soil and grazing management practices which benefit biodiversity, water quality and soil health, alongside earning a potential new income and helping to reduce GHG emissions.

The challenge with setting targets for soils is their variability and establishing current (and varying) baselines. However, in general, increasing Soil Organic Matter is a good ambition due to the multiple benefits it provides, although some areas will have high existing levels already (such as permanent pastures or habitats in good condition). A farm scale study at 'North Wyke' showed how interrelated Soil Organic Carbon stocks were with various other environmental and productivity indicators, correlating positively with water discharge quality, botanical diversity, liveweight gain and stocking densities.<sup>25,26</sup>

As outlined in our response to the Welsh Government consultation on its Draft Soil Policy Statement, any additions to the current legal framework around soils must consider all types of land management and impacts on soil.

Whilst previous Cross Compliance requirements regarding the management and protection of agricultural soils were in 'return' for the Basic Payment Scheme payment, it is possible that these requirements are introduced as part of a regulatory baseline for all farmers..

The Control of Agricultural Pollution review has also recommended that these (Cross Compliance) requirements are replicated within the regulations. Any steps to bring such measures into regulation would benefit from industry consultation, to ensure they are practical and implementable. The Environmental (Principles, Governance and Biodiversity Targets) Bill will also seek to further strengthen environmental governance, compliance and targets. Soil

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<sup>24</sup> <https://sustainablesoils.org/soil-carbon-code/about-the-code>

<sup>25</sup> <https://www.sciencedirect.com/science/article/pii/S1751731118000502?via%3Dihub>

<sup>26</sup> [Key Research Findings](#)

health also crosses over into the Sustainable Land Management objectives and the Agriculture (Wales) Act 2023 objectives, therefore any targets or legal frameworks for soils should be incorporated into these existing pieces of work.

It is important to emphasise the challenge for farmers having to comply with these regulations and expectations, whilst competing against other agri-food imports produced to far lower environmental standards.



# Farmers Union of Wales' feedback on the draft soil policy statement

4th October 2022

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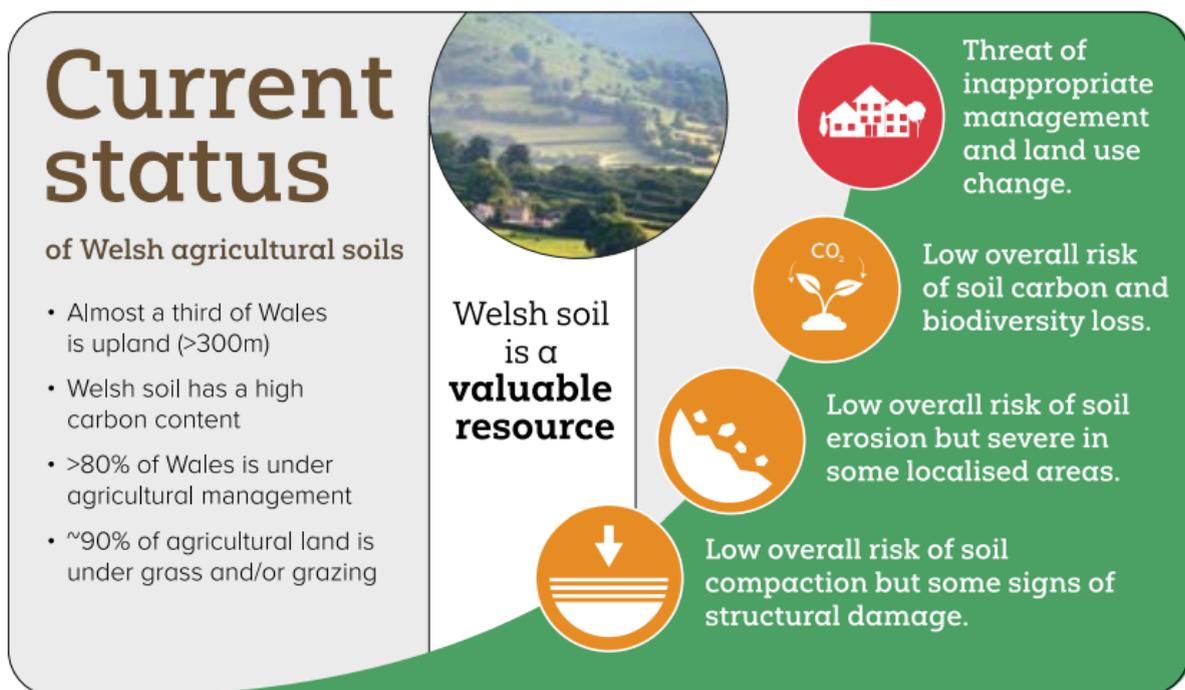
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## Farming the Welsh Way

The Welsh Soil Evidence Review<sup>1</sup> is a welcome, useful review and a generally positive document which highlights the soil health benefits arising from the “Welsh Way”<sup>2</sup> of farming. Farming permanent grasslands (>80% of agricultural land in Wales), with mixed (cattle and sheep grazing together) and rotational/seasonal grazing (graze and rest systems, or summer/winter only hill grazing systems) on soils with a ‘higher greater carbon content than most soils in England and Europe’ all contribute towards;

- keeping soils covered
- a consequently low risk of soil erosion
- high soil organic matter content which contributes towards better water infiltration rates, higher carbon sequestration, and healthier soil microbiology and soil fertility

However, the review recognises the risks to soil health associated with land use change (such as afforestation, development or conversion to arable), inappropriate management (such as compaction) and climate change.



## Insufficient consultation period to create a shared vision

The Welsh Government has aimed to gather feedback from farmers on the draft soil policy statement in order to ‘ensure it is fit for purpose and represents a shared vision for soil policy

<sup>1</sup> [Welsh Soil Evidence Review & https://gov.wales/sites/default/files/publications/2022-08/review-welsh-soil-evidence-executive-summary\\_0.pdf](https://gov.wales/sites/default/files/publications/2022-08/review-welsh-soil-evidence-executive-summary_0.pdf)

<sup>2</sup> [The Welsh Way](#)

*in Wales*'. However, the FUW would argue that despite the importance of this work, the consultation period has not been transparent enough to ensure this is a genuinely shared vision.

For example, the draft statement was shared only three weeks before the deadline for comment, which has not given the FUW sufficient time to consult fully with its members in respect of its democratic structure. In addition, the small workshops held in September consisted of farmers who had noticed the sign up call during the week prior to the Royal Welsh Agricultural Show makes it difficult to ensure that a wide cross section of farmers were consulted, especially given the soil policy needs to be fit for all farmers.

The key objectives were therefore arguably not shaped by those farmers or land managers who are managing soils every day, and who are most directly influenced by either support or regulations relevant to soils.

However, the FUW appreciates that the Sustainable Farming Scheme co-design has taken priority during this period. The FUW would therefore appreciate the opportunity to share the Welsh Government's response to this feedback with its county branches. Nevertheless, the comments provided below have been compiled from longstanding policies of the FUW.

## A soil policy should be holistic

In addition, it is appreciated that the focus of the soil policy statement is on agricultural soils due to 80% of the land in Wales being managed for agriculture. However, that does not necessarily mean that agricultural soils are those with the highest risk of soil degradation. On the contrary, the review recognises the low risks that most of this management poses to soil degradation, therefore, a holistic soil policy should incorporate all land uses, especially those which result in more soil disturbance than permanent pastures - such as forestry (*“Activities associated with afforestation such as planting, management and harvesting disturb soil and can cause soil carbon loss during first rotation forestry”*<sup>3</sup> [108]), housing, road building, and renewable energy plants.

## Existing soil protection, regulation and the impact of competition on farming standards

The FUW welcomes the development of a soil policy and an increased focus on soil health, however, the statement claims 'there is no soil protection policy in Wales'. Conversely, farmers have to comply with a number of rules relating to soils in order to access financial support via the Basic Payment Scheme. For example,

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<sup>3</sup> D. Berdeni, J. Williams, and J. Dowers, "Assessment of the impact of tree planting on Welsh organo-mineral soils," Soil Policy Evid. Program. Rep., 2020.

- Cross compliance: rough surface soil guidance<sup>4</sup>
- GAEC 4: Minimum soil cover<sup>5</sup>
- GAEC 5: Managing land to limit soil erosion<sup>6</sup>
- GAEC 6: Maintenance of soil and organic matter<sup>7</sup>

Currently, managing soils in this way in addition to producing food is supported via the Basic Payment Scheme (which makes up around 80% of Welsh farmers' income). However, the Agriculture (Wales) White Paper<sup>8</sup> proposed to make these rules 'National Minimum Standards'. Therefore, all farmers, regardless of whether they are in receipt of any subsidies, will have to comply with these regulations or risk civil sanctions against them.

Whilst Welsh farmers are proud of the high environmental and animal welfare standards Welsh food is produced to, there is a risk, particularly with liberalised trade deals being struck with large agri-exporters<sup>9</sup> that UK agriculture will be undercut, or undermined by the produce being imported. The costs incurred with complying to these higher standards, or the production reduction means that raising the regulatory baseline for Welsh farmers may simply serve to make them uncompetitive at their current level of production, and consequently offshore the UK's environmental footprint to other countries, whilst becoming more dependent on imported food.

Therefore, if the liberalisation of free trade agreements and unfair competition continues, the Welsh Government will need to provide additional support for farmers to ensure environmental standards are upheld and farmers are able to stay competitive. Therefore, the FUW proposes the following changes to the objectives.

## Rewarding farmer-led soil health enhancement - alternative objectives

The current objectives proposed are:

### **Maintain and enhance the soil resource, soil functions and services by:**

#### **1. Reducing soil degradation**

- Maintain and enhance soil organic matter
- Minimise soil erosion
- Minimise soil compaction
- Foster soil biodiversity

#### **2. Exchange knowledge on the value and vulnerability of soil**

- Enhance effective enhance of knowledge between farmers, decision makers and

<sup>4</sup> [Cross compliance: rough surface soil guidance](#)

<sup>5</sup> [Cross compliance: minimum soil cover \(GAEC 4\) \(2020\)](#)

<sup>6</sup> [Cross compliance: managing land to limit soil erosion \(GAEC 5\) \(2015\)](#)

<sup>7</sup> [Cross compliance: maintenance of soil and organic matter \(GAEC 6\) \(2022\)](#)

<sup>8</sup> [Agriculture \(Wales\) White Paper](#)

<sup>9</sup> [Farmers' Union of Wales \(FUW\) submission to a Senedd Economy, Trade and Rural Affairs inquiry into the UK-Australia Free Trade Agreement](#)

scientists

**3. Maintain and develop soil monitoring and modelling**

Additional monitoring of soil at local scales

Feedback outcomes to land managers to support farming decisions

The FUW proposes amending these objectives to enable more direct support to farmers for management actions they can take, or are currently undertaking, to enhance soil health.

For instance, the title of the first objective '*reduce soil degradation*' is at odds with the current low evidence of soil degradation on agricultural soils across Wales as a whole. 'No direct evidence for measured erosion rates'... 'grassland is generally considered to be at a low risk to soil degradation'. This gives an unjustified negative impression of agricultural soil management in Wales.

Furthermore, whilst administering and coordinating knowledge exchange, and undertaking additional monitoring are important and valuable objectives, they do not provide direct financial support for on-farm actions to enhance soil health enhancement or cover soil protection measures (as outlined is needed in Section 4.)

Therefore, the FUW would argue for the key objectives to be amended to:

Protect soil organic matter levels

- a) It is important to place an emphasis on protecting and maintaining soil organic matter (SOM) content in Wales, particularly due to its value as a large carbon store. Whilst in some instances, soil organic carbon (SOC) is at an equilibrium of emissions/sequestration in soils with existing high SOM levels (and therefore does not represent an active carbon sink) it is still a highly valuable and large carbon store in Wales (the total soil carbon stock in Wales is 410 Mt, with grasslands storing a large proportion of this). As the review emphasises, '*it is of national and global importance that this carbon is retained*'.
- b) Therefore, maintenance and protection measures supported by the Government are essential, particularly as any carbon market payments in the future will only value and pay for **new and additional** carbon sequestration.
- c) Placing an emphasis on the protection and maintenance of permanent pastures would also value the current agricultural management outlined in Section 1, whilst putting in place measures to avoid compaction (such as track infrastructure and water trough placement as practised on many dairy farms) or erosion, protection of peatlands, and preventing the soil carbon loss from afforestation onto organo-mineral soils.

## Enhance soil organic matter levels

- a) SOM is the best indicator of carbon storage and sequestration, water retention and ease of infiltration, population and diversity of soil biota and accessibility of plant micro and macronutrients. Whilst SOM levels are typically high in Wales, there are multiple (and public) advantages to increasing these levels<sup>10</sup>, many of which would reflect the Sustainable Land Management outcomes the new Sustainable Farming Scheme is aiming to achieve<sup>11</sup> (see graphic below).

### 2.2 Sustainable Land Management Outcomes

The Scheme sets out a range of actions farmers can undertake. However, it is important we make a clear connection between these actions and the outcomes they are seeking to deliver. These are:



#### Clean air

Air which has limited pollution (human made particles and harmful gases) including fine particulate matter, ammonia and non-methane volatile organic compounds.



#### Mitigate flood and drought risk

Farms prepare for periods of low or high rainfall, reducing the risks to the farm and communities from flooding, drought and coastal erosion.



#### Clean water

The water environment (including inland water) is sustainably managed to support healthy communities, flourishing businesses and biodiversity.



#### Protected natural landscapes and historic environment

Conserve and enhance natural beauty, cultural heritage and the historic environment.



#### Enhanced access and engagement

People are more easily able to enjoy the countryside for health and wellbeing benefits.



#### Reduced greenhouse gas emissions

Farms reduce their greenhouse gas emissions, through making efficient use of fuel and energy, minimising external inputs and having productive livestock and crops.



#### High animal health and welfare

Animals are healthy, productive and have a good quality of life.



#### Resilient ecosystems

Maintaining and enhancing the resilience of ecosystems delivering benefits for biodiversity, species and habitats.



#### Maximise carbon storage

Creating new and enhancing existing carbon stocks on farms.



#### Resource efficient

Taking a circular approach by keeping resources and materials in use for as long as possible and avoiding waste.

- b) This could include supporting the management actions outlined in the Welsh Soil Evidence review which increases SOM such as; rotational grazing/seasonal grazing/graze and trample and rest management, deeper

<sup>10</sup> [Rotational grazing shown to increase soil organic matter on Welsh farm](#)

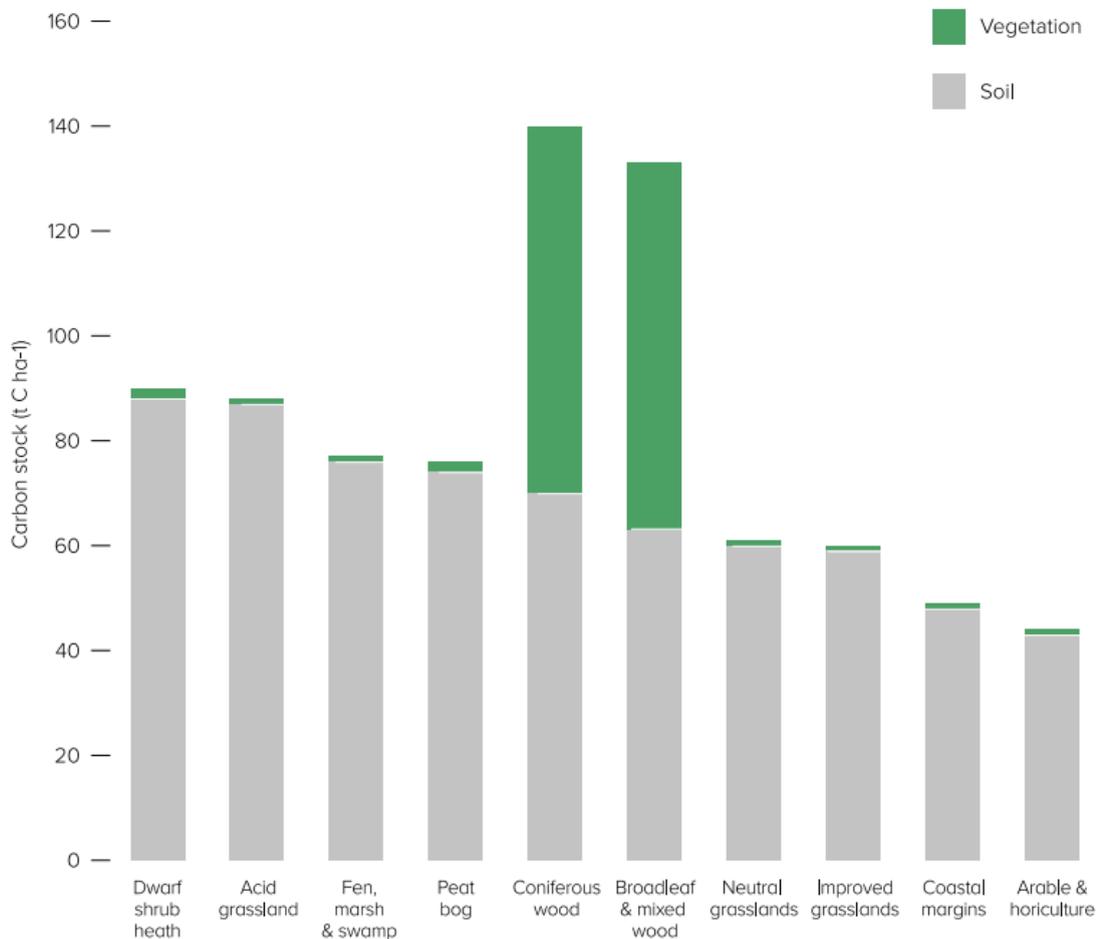
<sup>11</sup> [Sustainable Farming Scheme Outline Proposals for 2025](#)

rooting and more diverse grass species (whether through allowing native species to grow taller and set seed, or reseeded deeper rooting and mixed species leys into improved grasslands), increasing nitrogen fixing species, ensuring an efficient use of nutrients/inputs, minimum tillage etc.

- c) Increasing tree/woody cover has also been identified as a way to increase SOM when including trees on arable land due to the extensive litter, rooting and carbon inputs, however there is a risk of carbon **loss** when planting on high carbon soils, such as peat and organo-mineral soils. Therefore care must be taken not to apply this as a blanket policy to increase SOM/SOC. For example, whilst net carbon sequestration may increase due to the additional biomass within the tree/hedgerow cover (Figure 11), the Welsh Soil Evidence Review states that it can **decrease** the SOC levels (*Other studies have shown a decrease in topsoil carbon 14 years after planting trees in pasture in England [119] or no change in SOC or soil N 26 years after converting permanent grassland to silvopasture or woodland in Northern Ireland [120].) & 'adjacent grassland had a total SOC stock comparable to ancient woodland, which indicated that, for these sites, woodland creation on pasture had little benefit for soil carbon sequestration compared to woodland creation on former arable land [116].)* However, it is recognised that different benefits will arise such as increased crop yields due to reduced wind stress, livestock shelter, improved soil structure from rooting depth, and moderation of temperature extremes.

**Figure 11: The soil and vegetation carbon stock in different habitats**

Data <sup>[57]</sup> is from 15 cm deep soil samples in England. Woodland vegetation data is from 50-year-old average rotations.



d) Furthermore, the FUW believes there should be more of an emphasis within the soils policy statement on the **management of grasses and livestock to improve soil health and soil biodiversity**. The agricultural industry in Wales is already a leader in developing grass species<sup>12</sup>, grassland management and in sustainable livestock management<sup>13</sup>, and therefore there is great potential in harnessing the existing experience and knowledge to further improve SOM and its associated benefits. Yet, the Welsh Soil Evidence review makes limited, or purely negative references to this potential - they state '*a major threat to soil biodiversity is the intensification and extensification of agricultural management*' (which seems contradictory as extensive livestock systems are generally seen as the opposite of intensive management), whilst then admitting that '*Limited evidence currently exists on trends in soil biodiversity in Wales*'.

e) For example, **plant/grassland diversity is a key driver of SOC formation and storage**. '*High plant diversity enhances SOC storage by elevating*

<sup>12</sup> [Aberystwyth celebrates 100 years of grass breeding at IBERS](#)

<sup>13</sup> [Perfecting the Welsh Way](#)

*belowground carbon (i.e., root biomass and root exudates) inputs (13, 14) and promoting microbial growth, turnover, and entombment of necromass (15). Maintaining consistently high levels of biodiversity and root carbon inputs is essential for enhancing SOC storage and persistence in grasslands (Fig. 1)*<sup>14</sup> The actions outlined in 2b could help encourage greater diversity into our grasslands, and value those which are already diverse.

- f) Furthermore, **‘grazing management and biodiversity restoration can provide low-cost and/or high-carbon-gain options for natural climate solutions in global grasslands. The achievable SOC sequestration potential in global grasslands is 2.3 to 7.3 billion tons of carbon dioxide equivalents per year (CO<sub>2</sub>e year<sup>-1</sup>) for biodiversity restoration, 148 to 699 megatons of CO<sub>2</sub>e year<sup>-1</sup> for improved grazing management, and 147 megatons of CO<sub>2</sub>e year<sup>-1</sup> for sown legumes in pasturelands.**<sup>1516</sup> The FUW would argue these potential gains for Wales should not be dismissed, particularly due to their potential to create multiple benefits, nor impact negatively on food production.
- g) There is inconsistency and a lack of clarity in the review about the impact of stocking densities on soil health. Whilst it is understood that, like machinery, livestock can create compaction issues under certain conditions, however, grazing management can also be used to improve soil health and biodiversity. ‘Light grazing’ is referred to within the review in one section (6.3) as a reduction of stocking rates, and stated to be the most beneficial for soil carbon in grasslands. However, within the global analysis referenced, light grazing is used in the context of seasonal or rotational grazing, with other studies recommending high stocking densities in some instances to trample organic matter into the soil, and encourage growth to increase photosynthesis<sup>17</sup>. This implies that the rest period was more crucial than the stocking rate.
- h) Reductions in grazing, and the resultant loss of vegetation structure – for example through the dominance of species such as purple moor grass (molinia) - has had adverse impacts for species such as golden plover and other waders, including curlew<sup>18</sup> - now considered the most pressing bird conservation priority in the UK. Moreover, a more recent study found that trebling sheep numbers led to the largest increase in species diversity on mountain land compared with either the removal of sheep or the introduction of cattle.<sup>19</sup> Similarly, analysis by Plantlife has shown that more than half of all wild plants need regular management or disturbance to thrive, and that 39.6%

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<sup>14</sup> [Grassland soil carbon sequestration: Current understanding, challenges, and solutions | Science](#)

<sup>15</sup> [Grassland soil carbon sequestration: Current understanding, challenges, and solutions | Science](#)

<sup>16</sup> [Pasture for Life: A solution to global warming](#)

<sup>17</sup> [Managing Grazing to Restore Soil Health, Ecosystem Function, and Ecosystem Services](#)

<sup>18</sup> Changing livestock numbers in the UK Less Favoured Areas – an analysis of likely biodiversity implications, RSPB, December 2012

<sup>19</sup> Long-term impacts of changed grazing regimes on the vegetation of heterogeneous upland grasslands, Pakeman, R. J. et al., Journal of Applied Ecology (2019)

of species would decline within a decade if the land on which they grow is abandoned, while 16.4% would decline within 1-3 years under such circumstances.<sup>20</sup>

- i) The review also reveals that in the past 30 years, whilst topsoil carbon was stable in improved land, it **decreased in habitat land** (and increased in woodland). Potentially the lack of livestock dynamics and disturbance has stalled this increase. Whilst the soils review is a comprehensive and detailed review, this area needs far more attention and research.

Increase farmer knowledge of soil management (including through gathering iterative data)

- a) As recognised in the draft soil policy statement, knowledge exchange between farmers, and knowledge transfer between experts and farmers is a powerful tool for improving the management of soils. Many farmers are already part of grazing groups, discussion groups and organisations which drive forward their performance.
- b) The FUW believes there is a great opportunity within the new Sustainable Farming Scheme and the proposed Sustainability Review to **pay farmers for the on-farm data they provide**, particularly as the Soils Review identifies many areas where more detailed and localised data is required. However, the data should then inform farmers as to what management support/capital costs/advice is needed from the Sustainable Farming Scheme payments based on the data, therefore, providing more **targeted support** and ensuring the data results in direct action/maintenance. Farmers already provide detailed data by completing the Single Application Form on an annual basis via RPW Online, and much more could be done to provide this data **back** to farmers, enabling benchmarking between farms in order to ensure there is an annual, iterative and useful process of data provision.
- c) Many farmers are undertaking carbon audits, however, the lack of consistency between calculators, particularly regarding carbon sequestration rates such as from soil, is a barrier to engagement. If the Welsh Government provided consistent, comparable and simple KPIs/proxies for carbon as part of the Sustainability Review, it would provide a large amount of useful data for both farmers and the Government, and begin the process of carbon auditing for many farmers.
- d) In addition, demonstrating the business value of soils is an important aspect of knowledge transfer, particularly as soils under agricultural management are not managed in isolation to the business (see objective 4). For instance nutrient management cost savings/optimisation, value of dung beetles/earthworms, the impact of soil compaction on productivity, value of

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<sup>20</sup> [Rewilding, July 2019](#)

liming etc. Many soil health indicators (such as compaction, earth worm counts) could also be incentivised and tested by farmers themselves, as opposed to being presented in a report, which would also increase knowledge and engagement in soils.

### **Sustainable Farming Scheme proposals relevant to soils:**

(U) Carry out professional and farmer soil testing at Scheme entry and in time for contract renewal to include a combination of:

- Nitrogen (N), Potassium (P), Phosphorous (K), Carbon and pH
- a biological measure e.g. eDNA, respiration counting 'proxy' species (earthworms)
- a physical assessment e.g. infiltration rate, bulk density or Visual Evaluation of Soil Structure (VESS).

(U) Submit nutrient accounts and evidence covering N, P, K, C and pH.

(O) Optional Actions which impact a farm's nutrient use and soil condition can be found throughout this document, including actions to:

- supplement applied nitrogen with nitrogen fixing plants (establishing mixed swards, planning rotations, cover cropping)
- establish leys and crops with varied rooting profiles (establishing mixed swards, crop rotations, cover cropping)
- improve soil biology (diverse planting, graze and rest practices, minimum or no till, use of anthelmintic plants to reduce wormer usage, habitat management)

(C) Support for farmers to work together in a catchment to improve water quality.

(FC) Farming Connect will provide support for:

- soil sampling
- technical advice to interpret results and use it to benefit their farm and the environment
- farmer-led learning on soil health.

Ensure soil policy, regulation and support enhances, and does not damage, the economic sustainability of family farms

- a. 80% of the land in Wales is managed by farmers. Therefore, the management of soils is inextricably linked with the farming businesses and their economic viability and business decisions. They are dependent on each other. The potential negative impacts of market competition, pressure on standards and a higher regulatory baseline to both farming businesses and the health of soil are outlined above, therefore, including this objective would ensure that policies are not designed in isolation to these important considerations.
- b. Any policies which influence farming businesses must also consider the significant contributions such families make to Wales' economy, culture,

language and jobs - factors which are all underpinned by ensuring that farming enterprises remain financially sustainable.

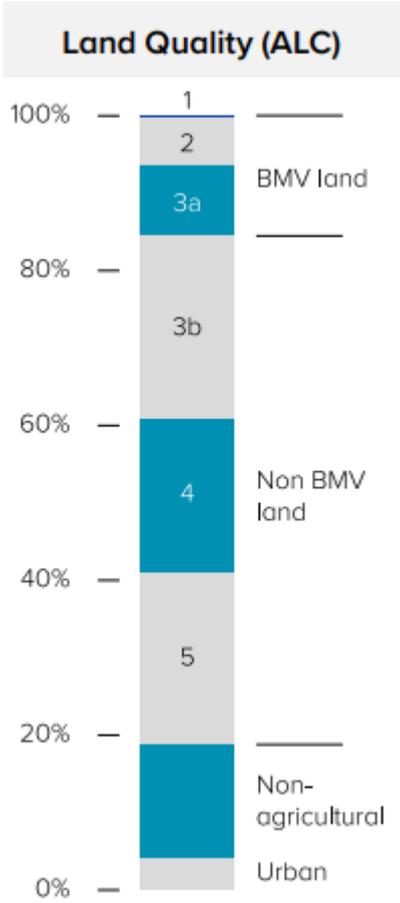
## Additional considerations

The impacts of the Water Resources (Control of Agricultural Pollution) (Wales) Regulations 2021 on soils in Wales must be taken into consideration.

The FUW has, on a number of occasions, raised concerns regarding the impact these regulations will have on grazing management and stocking densities. It is evident that the loss of upland and hill reared suckler herds would result in the decline in species diversity and therefore the regulations in their current form go against a longstanding policy of the Welsh government to support farmers through environmental schemes such as Glastir to graze cattle in recognition of the benefit it provides for biodiversity.

Furthermore, these regulations in particular will place significant pressure on cattle farmers to empty their stores before the closed period and spread as much as possible within the limits after the closed period to ensure that storage capacity limits are not exceeded, rather than spreading at the optimal time in regard to weather conditions, soil and crop requirements.

Consideration should also be given to protecting the Best and Most Versatile land for agriculture (10-15% of land in Wales), particularly as there will be more challenging growing conditions in the future. There will undoubtedly be pressure on BMV land from urban, mineral and land-based renewables, development and afforestation, however, the FUW would argue that food security in the future must be safeguarded.





- 7 Farmers have long recognised the value of their soils to their farming businesses. The naturally variable characteristics have been one of the most significant factors in shaping local and regional land use.
- 8 Welsh Government's Soils Evidence Programme commissioned ADAS to undertake an assessment of Welsh soil issues in context<sup>3</sup> in 2019. This identified that agricultural management is the major controllable factor influencing soil condition as 85% of the land area of Wales is utilised for agriculture. This assessment determined that many soils in Wales remain in good condition and are at a low risk of degradation under current agricultural management, which is dominated by permanent grassland (i.e. grassland not ploughed for >5 years). Welsh Government's Soil Evidence Review<sup>4</sup> identified that *'the current land use, soil and climate combination in Wales is favourable to minimising widespread risks and threats to soil from degradation processes such as erosion, compaction, and loss of biodiversity'*.
- 9 At farm level, a combination of knowledge, research and technology drives an increasingly sophisticated and diverse range of management strategies which are making soils more resilient and sustainable such as different grazing regimes, cultivation techniques and companion cropping.
- 10 There is a need to recognise, however, that soil is an extremely complex system and there is still much to be researched and learned on a practical scale. This makes soil management inherently complex. Variables like weather conditions, cropping, point in the rotation, time of testing, soil type and topography mean that actions which drive a measurable improvement in soil health in one year, do not the next. Improving soil health is fundamentally a long-term process, and progress may be difficult to measure so trends over time are much more important than short-term absolute measures.
- 11 Whilst progress is being made, farmers are increasingly aware of the link between good soil management and productivity and the need to protect and enhance this precious resource for all the beneficial services it provides, particularly in the context of a changing climate which, could, for example, lead to an increased risk of soil erosion due to extreme weather events.
- **Monitoring of soil health**
- 12 Monitoring and measuring soil health is key to sustainable soil management. Many farmers already routinely test and assess soil fertility using professional soil testing services and use the data to maintain or improve crop and livestock productivity, as well as environmental benefits.
- 13 Key indicators of soil health include chemical, physical and biological characteristics such as levels of organic matter / carbon, nutrient balance, pH level, earthworm count, soil structure and biodiversity. Interactions with water are also important so drainage, water retention and compaction are also indicators of healthy soils that farmers consider.
- 14 There is still much to learn about how soil contributes to productivity, biodiversity and climate change. More work is needed to assess the impact of specific soil management practices on physical, chemical and biological soil health.
- 15 NFU Cymru supports investment in soil management research and innovation from both the public and private sector. Soil management practices need to be evaluated for their impact on physical, chemical and biological soil health and any research developed should be easily accessible to farmers.

<sup>3</sup> [Assessment of Welsh Soil Issues in Context](#)

<sup>4</sup> [Synthesis of Welsh Soil Evidence](#)

- 16 Research also needs consider the role of soil amendments like the land-spreading of biochar and enhanced mineral weathering which have the potential to capture carbon, their long-term interaction with soil ecology needs to be evaluated before possible inclusion within soil management policy.
- 17 There are opportunities for the uptake of new technologies like drones, satellite imagery and DNA sequencing to aid soil monitoring. The industry is ready to take advantage of these technologies. Soil testing should be affordable and accessible to give a true picture of the high variance of soil types at farm and field parcel level.
- **Classification of soils for land use**
- 18 The Agricultural Land Classification (ALC) is a scientific system used to assess how good land is for growing crops. In Wales, around 10-15% of the land area is classified as BMV (Best and Most Versatile land) for agriculture defined by ALC grade classes 1, 2 and 3a and is '*conserved as a finite resource for the future*' within Planning Policy Wales<sup>5</sup>. The Welsh Soil Evidence Review identifies that 75% of land in Wales has an ALC grade of 3b, 4 and 5 (non-BMV) which is less capable of arable cropping.
- 19 However, there is a need to recognise that agricultural production in Wales is largely characterised by grass-based livestock systems, producing high-quality protein and in the context of predicted challenges to our global food production systems, where food production systems elsewhere are expected to face greater challenges due to climate change impacts, we believe Wales has a social responsibility to contribute to global food security.
- 20 On this basis, and in the context of the multiple and increasing pressures on land use in Wales, NFU Cymru believes greater protection should be afforded to safeguard all agricultural land and our agricultural productive capacity in the future. Land is a finite resource and NFU Cymru restates our ask for a decision-making framework to guide land use change decisions so that the long-term effects to food production and wider economic, environmental, social and cultural impacts can be properly assessed.
- **The policy and legislative mechanisms to protect soils and productive land (including the Sustainable Farming Scheme, National Minimum Standards and planning policy (amongst others))**
- 21 NFU Cymru believes that with the right support and incentives, there are opportunities to further enhance soil management on Welsh farms, but only if we avoid overly prescriptive, simplistic and restrictive approaches. We are clear that 'one size fits all' approach is challenging and could be detrimental to soil health.
- 22 For example, Part 2 of the Control of Agricultural Pollution Regulations 2021, places limits on the application of livestock manures which leads to an increasing reliance on inorganic manufactured fertilisers. The regulation is perverse, works against net zero and circular economy principles and prevents farmers from making the best use of organic fertilisers with impacts for soil organic matter. It is important to recognise that the Survey of Fertiliser Practice<sup>6</sup> shows a long-term decline in overall application rates of Nitrogen, Phosphorus and Potash since 1983 and, in the context of the historically high costs of manufactured inorganic fertilisers and availability challenges, farmers are looking at alternative ways of providing nutrients to their soils to maintain soil fertility.

<sup>5</sup> [Planning Policy Wales - Edition 12](#)

<sup>6</sup> [fertiliseruse-annualreport2223-18jul24.odt](#)

- 23 Protection for soils is also provided for through the current Basic Payment Scheme (BPS) which requires farmers to follow a set of requirements set out in Cross Compliance<sup>7</sup>. This includes GAEC (Good Agricultural and Environmental Condition) and SMR (Statutory Management Requirements). There are a number of GAEC and SMR that deliver direct and indirect benefits for soil health, for example, SMR 1: Water Protection, SMR 10: Restrictions on Plant Protection Products, GAEC 4: Minimum Soil Cover, GAEC 5: Managing land to limit soil erosion and GAEC 6: Maintenance of Soil Organic Matter.
- 24 In the Sustainable Farming Scheme (SFS): Proposed Scheme Outline<sup>8</sup> published in November 2024, Welsh Government indicates that the Transition Period for the phase out of the BPS will be 2026-2029. Cross Compliance will, therefore, continue to be in place for BPS participants throughout this period.
- 25 Welsh Government has also confirmed they expect Cross Compliance to form part of the regulatory baseline for the Sustainable Farming Scheme commencing in 2026.
- 26 Through the Sustainable Farming Scheme farmers will receive a Universal Payment in return for undertaking Universal Actions (UAs). In addition, to the regulatory baseline and the proposed Universal Code, there are a number of Universal Actions that support further progress in the management of soils including UA3: Soil Health Planning, UA5: Integrated Pest Management and UA7: Habitat Maintenance.
- 27 Action will be dependent on widespread uptake of the scheme by farmers and NFU Cymru is clear that more work is needed to ensure the scheme is attractive to all farmers in Wales, irrespective of sector and location. It is also vital that the SFS provides the same level of certainty and stability to farm businesses as the BPS does currently.
- 28 Subject to budget, the Optional Action and Collaborative Action layers of the Scheme will provide additional opportunities for action on soil health, including on peatlands which cover 90,000 hectares (4.3% of the land area) and the largest terrestrial store of carbon in Wales. The scheme must include a focus on capital support to allow farmers to invest in soil management measures and the latest technologies and equipment recognising that practices such as liming and drainage repair deliver productivity and environmental benefits.
- 29 The requirement to share data on soils with Welsh Government through UA3: Soil Health Planning has emerged as a key concern from farmers. This could ultimately act as a barrier to scheme uptake. Farmers have expressed a lack of confidence that there are robust safeguards and governance in place providing protection for any soil data supplied. For example, in the face of Freedom of Information or Environmental Information Regulation provisions.
- 30 Whilst we recognise the potential to aggregate farm level data to gain valuable insights into macro trends in soils health, this potential will only be realised if farmers are provided with appropriate ownership and control over what data is shared and how their data is utilised. This is a key aspect of scheme design yet to be resolved.
- 31 In respect of wider regulation, there is a need for clear and enforceable regulations and assurance schemes to prevent contamination of soil by materials like composts, digestates and sewage sludges. These materials must be kept free of contaminants such as glass, metal, plastics and polyfluoroalkyl substances (PFAS) and other harmful substances. In particular, there must be efforts to prevent such materials from entering waste streams in the first place.

<sup>7</sup> [Cross compliance 2024 | GOV.WALES](#)

<sup>8</sup> [Sustainable Farming Scheme: proposed scheme outline \(2024\) | GOV.WALES](#)

- 32 Sensible regulation of voluntary carbon offset markets could also play a role in helping maintaining and improving soil health. The developing market in voluntary carbon offsets presents both opportunities and long-term implications for agriculture. Farmers need to have confidence that the rules and standards of the market are fair and accessible and that the Sustainable Farming Scheme can work alongside private finance to incentivise action to build further carbon stocks as well as reward the maintenance of existing stores. As custodians of organic matter and carbon already in the soil - Welsh soils are estimated to contain 410 million tonnes of carbon<sup>9</sup> – farmers would like to see the conservation and maintenance of these stores properly rewarded.
- 33 Overall, NFU Cymru does not support further regulation for farming in relation to soils. NFU Cymru's survey<sup>10</sup> of farmers for the four-yearly Statutory Review of the Control of Agricultural Pollution Regulations brought to life the 'on the ground' issues relating to the implementation of the regulations introduced in 2021. NFU Cymru is clear that an Independent Review is now urgently needed to consider the cumulative burden of regulation on farm businesses.
- **The potential for legal frameworks and targets for soils**
- 34 The key challenge for establishing legal frameworks and / or targets for soils lies in their inherent variability. There are 183 different soil series in Wales<sup>11</sup>. We concur with Welsh Government's Soils Evidence Programme assessment of soil issues<sup>12</sup> that highlighted that there are a number of challenges associated with regulating soil, which mainly relate to: the establishment of baseline and / or target values for soil properties.
- 35 Regional and local variation would have to be accounted for in any metrics used to measure sustainability. This variation can extend down to the field scale, and the results of many of these must be considered in relative terms when used to assess trends in pH, structure, organic matter and mineral content. On this basis, NFU Cymru would seriously question the feasibility of establishing legal frameworks and / or targets for soils.
- 36 To conclude, NFU Cymru would place on record our thanks to the Committee for the opportunity to contribute to its inquiry into soil health. We look forward to giving oral evidence to the Committee in due course.

**\*\*End\*\***

<sup>9</sup> [SoNaRR2020 Aim 1 assessment](#)

<sup>10</sup> [nfu-cymru-evidence-submission-review-of-coap-december-2024.pdf](#)

<sup>11</sup> [Synthesis of Welsh Soil Evidence](#)

<sup>12</sup> [Assessment of Welsh Soil Issues in Context](#)



# Soil Health in Agriculture

29/04/2025

Soil is an ecologically and economically valuable resource that sustains life and provides a range of ecosystem services to Wales.

This paper provides further evidence for the Economy, Trade & Rural Affairs Committee's scrutiny session on Soil Health in Agriculture.

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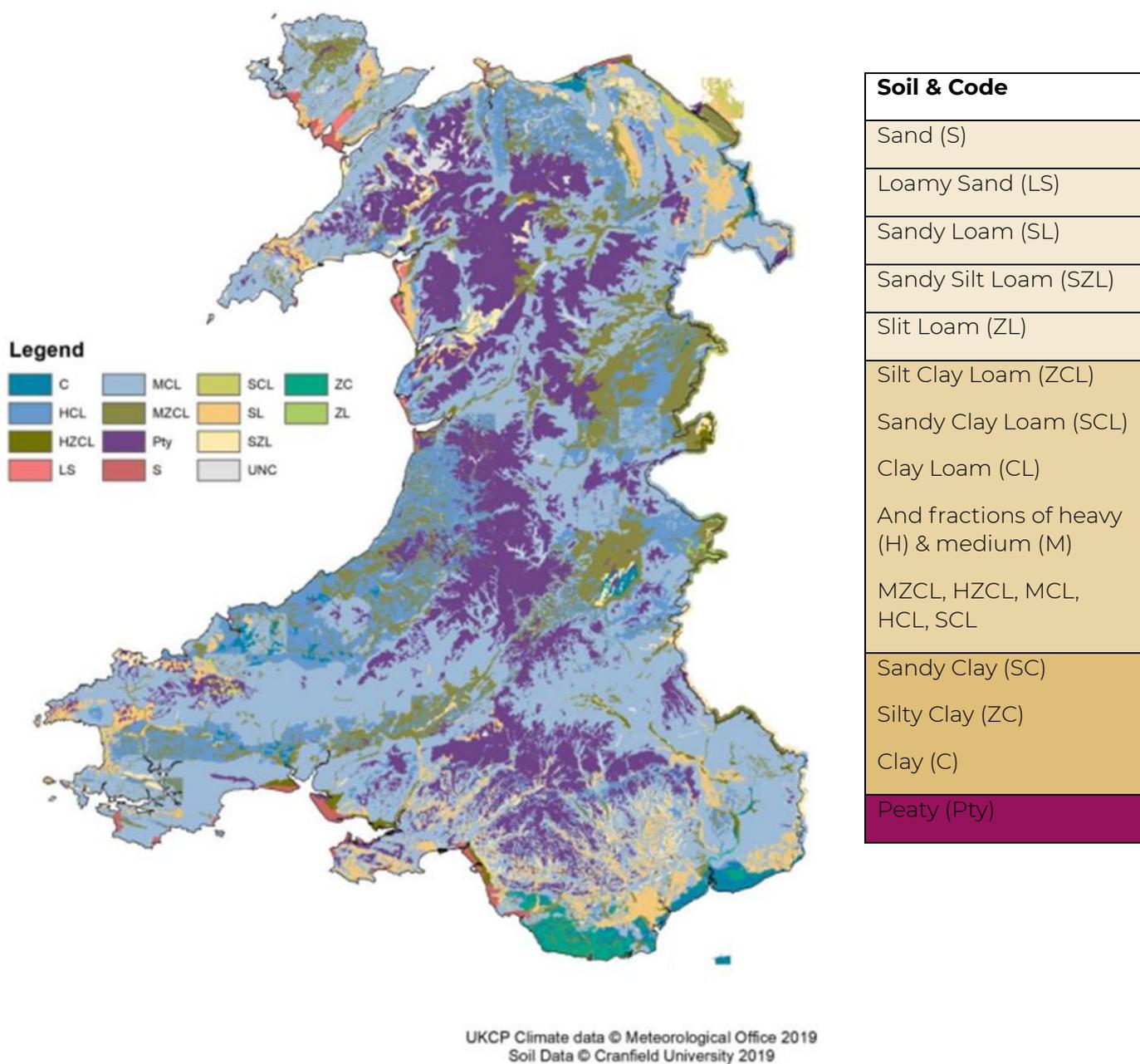
## 1. Introduction

The culture and environment of Wales is distinct, resulting from the soil and farming of the country, with grassland dominated systems and soils that are often wet and rich in organic matter. Due to slow formation processes, soil is considered a non-renewable resource and thus requires sustainable management. With over 80% of the land in Wales is under agriculture, land use and farming practice along with climate impacts are the main factors that influence the condition of soils in Wales.

There are 183 different soil series in Wales and their texture (Fig. 1) is made up of one or a combination of silt, sand, clay (mineral) and organic material. The role of soil texture is critical to all farming and soil management decisions. These can be generally described by four broad groups: 1) Mineral free-draining brown soils; Gley soils with impeded drainage and seasonally waterlogged; Organo-Mineral soils in cold and wet areas represented by a shallow (<30cm) peaty topsoil; and, organic peat soils having >30 cm depth of peat from the surface.

The variation in soil type, the climatic range it sits within (temperature, wind, rainfall) and site characteristics (gradient, flow-paths, bedrock, landscape) means the risk and associated degree of severity of impact from differing land use practices may be highly location specific.

Fig 1: Distribution of Topsoil Texture Classes:

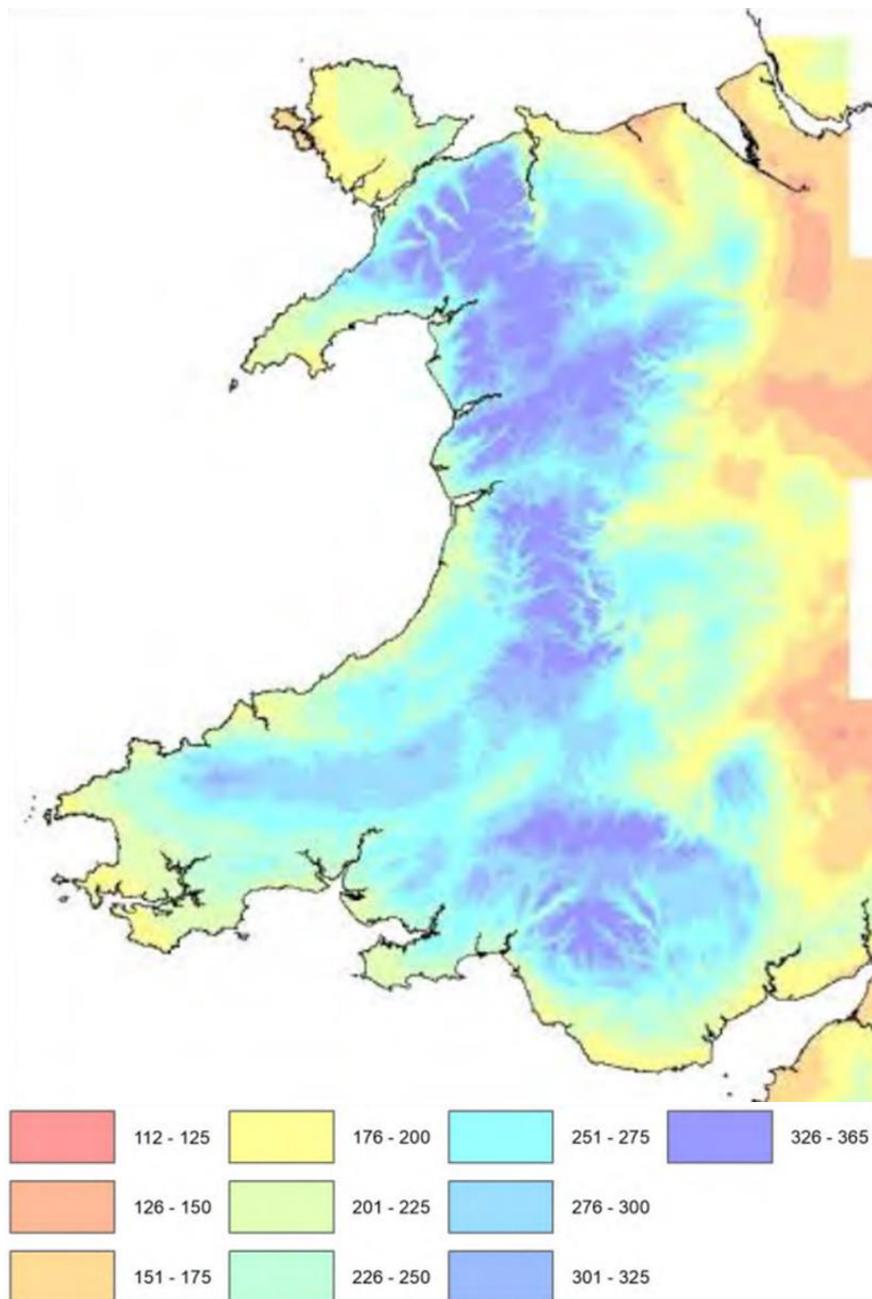


Land work and cropping opportunities are strongly limited in Wales by climate. Rainfall and temperature influence the planning of agricultural activities to ensure optimal soil conditions for both workability and trafficability. This is assessed through the number of Field Capacity Days (FCD) (Fig. 2) for any particular site (i.e. the number of consecutive days the soil is fully saturated).

Most Wales is at >200 FCD meaning the days to work and traffic soils are often <165 days per year. In comparison, some coastal and border areas are lower at 151-200 FCD, with many places in England at <151 FCD. Having fully saturated soil for most of the year, raises the risks associated with cultivation (erosion, compaction,

crop establishment, treatment and harvest) across large parts of Wales and is a significant reason why the majority of land use is grassland as opposed to arable.

**Figure 2: Field Capacity Day Zones**



A one size fits all approach cannot be applied across all soils, land use and climatic contexts. Soil protection and enhancement requires a degree of context specific interpretation whilst recognising the risks. The overarching Soil Policy Objectives are set out in the [Agricultural Soil Policy Statement \(ASPS\)](#). It seeks to provide a Wales specific framework to consider the development of interventions.

The Objectives are as follows:

**Objective 1:** Increase information on Welsh soils

**Objective 2:** Encourage sharing of information on soils

**Objective 3:** Protect, maintain and enhance soils, soil functions and services

These sub-objectives provide further information contained within the ASPS:

- i) Protect soils from erosion through appropriate management in areas at risk.
- ii) Maintain current stores of soil organic matter and increase where appropriate, through effective soil management.
- iii) Balance soils' nutrient cycling to ensure the effective delivery of soil functions and services.
- iv) Maintain and improve soil structure, with a focus on minimising soil compaction through appropriate management during high-risk wet conditions.
- v) Protect and foster soil biodiversity through appropriate management.

The Sustainable Farming Scheme, Farming Connect, the Planning Policy Framework, Climate Adaptation, ERAMMP, the Soil Policy Evidence Programme, SoNaRR, the Natural Resources Policy, the National Peatland Action Programme all play an important and distinct role in meeting the dynamic needs of protecting and enhancing Welsh soils.

## 2. The Role and State of Soils in Agricultural Systems:

Agricultural soils are an ecologically, economically, and socially valuable resource for Wales. They are considered a finite resource, due to slow formation rates. Agricultural soils provide several functions and services:

- — providing the basis for food, biomass derived energy, and raw materials like timber or other fibre crops
- — regulating environmental cycles of nutrients and carbon
- — providing valued habitats and sustaining biodiversity
- — regulating water flow and quality
- — regulating climate and mitigating some climate change impacts
- — preserving cultural and archaeological heritage such as in historic enclosures and traditional cultivation patterns.
- — providing a platform for infrastructure.

Most agricultural land (c.87%) is dominated by permanent and new grasslands and rough grazing land. The area under arable and horticultural cultivation is c.5-6% of the agricultural area. Large areas of managed grassland and wet climatic conditions (which generated large areas of peat and organo-mineral soil) have resulted in a greater carbon content than most soils in England and Europe.

In summary, agricultural soils in Wales are distinctive and are generally in good condition<sup>1</sup> due to the prevalence of soil protection afforded by grassland systems; however, there are highly localised soil issues.

Current threats include localised loss of soil organic matter, soil erosion, loss of soil structure and compaction and imbalanced soil nutrient cycles. Emerging threats are climate change and agricultural management change, which are interconnected and are expected to further increase pressures on soils. This is a priority area for further analysis of the long-term soil monitoring data.

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<sup>1</sup> [Synthesis of Welsh Soil Evidence](#)

### 3. Monitoring of Soil Health

The Environment and Rural Affairs Monitoring and Modelling Programme (ERAMMP) is funded by the Welsh Government to provide scientific evidence and analysis to support the development of policies and evaluate programme implementation in agriculture and land use. The [ERAMMP National Field Survey](#) builds on past monitoring including repeating the baseline Glastir Monitoring and Evaluation Programme (GMEP) field survey to provide national trends in natural resources including soils and to assess the impact of the Glastir scheme.

The ERAMMP National Field Survey soil measurements include soil organic matter, soil organic carbon, moisture and bulk density, pH, total nitrogen, available phosphorus, mesofauna, eDNA for microbial and animal populations and hotspots for soil loss and erosion feature prevalence. All the measurements are co-located with land-use and vegetation.

Soil monitoring is a key component of ERAMMP and the [Wellbeing of Future Generations Indicator 13](#) recognises this through reporting the measurement of the quantity of soil carbon and organic matter content of topsoil (0-15cm).

Some soil health properties take many years to respond to management changes, whilst others change seasonally. Whilst [The Welsh Soil Evidence Review](#) concludes soils in Wales are generally in good condition, ERAMMP's long term monitoring allows Welsh Government to assess longer term changes and trends.

The prevalence of grassland systems helps protect soils and store carbon. However, the recent [Wales National Trends and Glastir Evaluation](#) highlights several areas for further investigation. These include the rates of soil disturbance and erosion; a general increase in the density of agricultural soils; and a decline in soil carbon for horticultural and arable soils. National reporting enables Welsh Government to commission further investigation into the reasons for the trends, to target monitoring and to develop policy responses.

Specific policy, evidence, reporting and operational projects may be accessed through [ERAMMP \(Evidence & Analysis Reports\)](#), [State of Natural Resources Reporting](#) (SoNaRR), and the [Soil Policy Evidence Programme](#) (SPEP).

#### Current Priorities:

The SoNaRR [Assessment of Mountains, Moorlands and Heaths](#) confirms our peatland soils and habitats are generally in a degraded state and hence the reason for a bespoke and dedicated [National Peatland Action Programme](#)

(NPAP) to restore these precious wetland habitats. NPAP provides national coordination for the monitoring and reporting of peatland restoration activities across Wales. NPAP publishes all restoration and habitat management activity on the [Wales Peatland Data Portal](#).

The Soil Policy Evidence Programme Bare Soil Risk Monitoring Pilot Study is a 12-month project into the use of satellite imagery to assess the risk bare soils pose to watercourses for all catchments in Wales. The monitoring system is due to begin in June 2025 and report findings at the end of 2026.

Agricultural Land Classification (ALC) System Full Technical Update: this is a joint Defra & Welsh Government project to fully update ALC system, including the underlying data and methodologies, to ensure that land quality data is accurate and comprehensive into the future. The Welsh Government has provided considerable technical input into this project building upon the Technical Review Series [Parts 1-5](#) and [Scoping Assessment](#) we produced on behalf of the two governments.

## 4. Classification of Soils for Land Use:

The Agricultural Land Classification (ALC) of England and Wales classifies agricultural land into six grades (1, 2, 3a, 3b, 4 and 5) according to the extent climatic, soil and site characteristics restrict agricultural use. The limitations may affect the range of crops, the yield and the associated cost of farming the land.

10-15% of Wales is classified as Best and Most Versatile Agricultural Land (BMVAL), defined by ALC grades 1, 2 and 3a. BMV land can grow a range of crops and is the most flexible, productive and efficient in response to inputs, making it the best land to deliver a variety of food and non-food goods and services.

The Welsh Government takes an active role in protecting BMV land through planning policy, making representations on planning applications, providing land classification evidence and maintaining land classification survey standards. Wales is unique in offering a free ALC survey validation<sup>2</sup> service to ensure all parties can rely on the technical information they are presented with.

Planning Policy Wales<sup>3</sup> seeks to conserve BMV land as a finite resource for the future. Considerable weight should be given to protecting such land from development, because of its special importance. The scope and importance of the policy is further clarified in Dear Chief Planning Officer Letters<sup>4</sup>.

In 2017 Wales produced the [Predictive Agricultural Land Classification Map](#); the first substantive update in either England or Wales since the 1970s. It has been designed to assist Local Planning Authorities, Developers, Surveyors and Farmers make informed long-term decisions over the use of land in the planning system and to target survey work to the most appropriate locations.

In the paper 'The global standard bearers of soil governance'<sup>5</sup> by Lewis R. Peake and Cairo Robb Welsh Soil Governance in this context is described as: "*With respect to soils, the "letter of the law" varies little across the four countries [of the UK], but the interpretation, enforcement and supporting infrastructure of Wales sets it apart from its neighbours... In Wales, however, the primacy of ALC and BMV land has been maintained*".

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<sup>2</sup> [Agricultural land classification: predictive map guidance](#) (section 3)

<sup>3</sup> [Planning Policy Wales - Edition 12](#) - Paragraphs 3.58 & 3.59.

<sup>4</sup> [BMV agricultural land and solar PV arrays](#) & [Agricultural land classification reports](#)

<sup>5</sup> [The global standard bearers of soil governance - ScienceDirect](#) 4.1.6. Wales (UK)

## 5. The Policy and Legislative Mechanisms to Protect Soils and Productive Land.

### Agricultural Soil Policy Statement – Policy Landscape

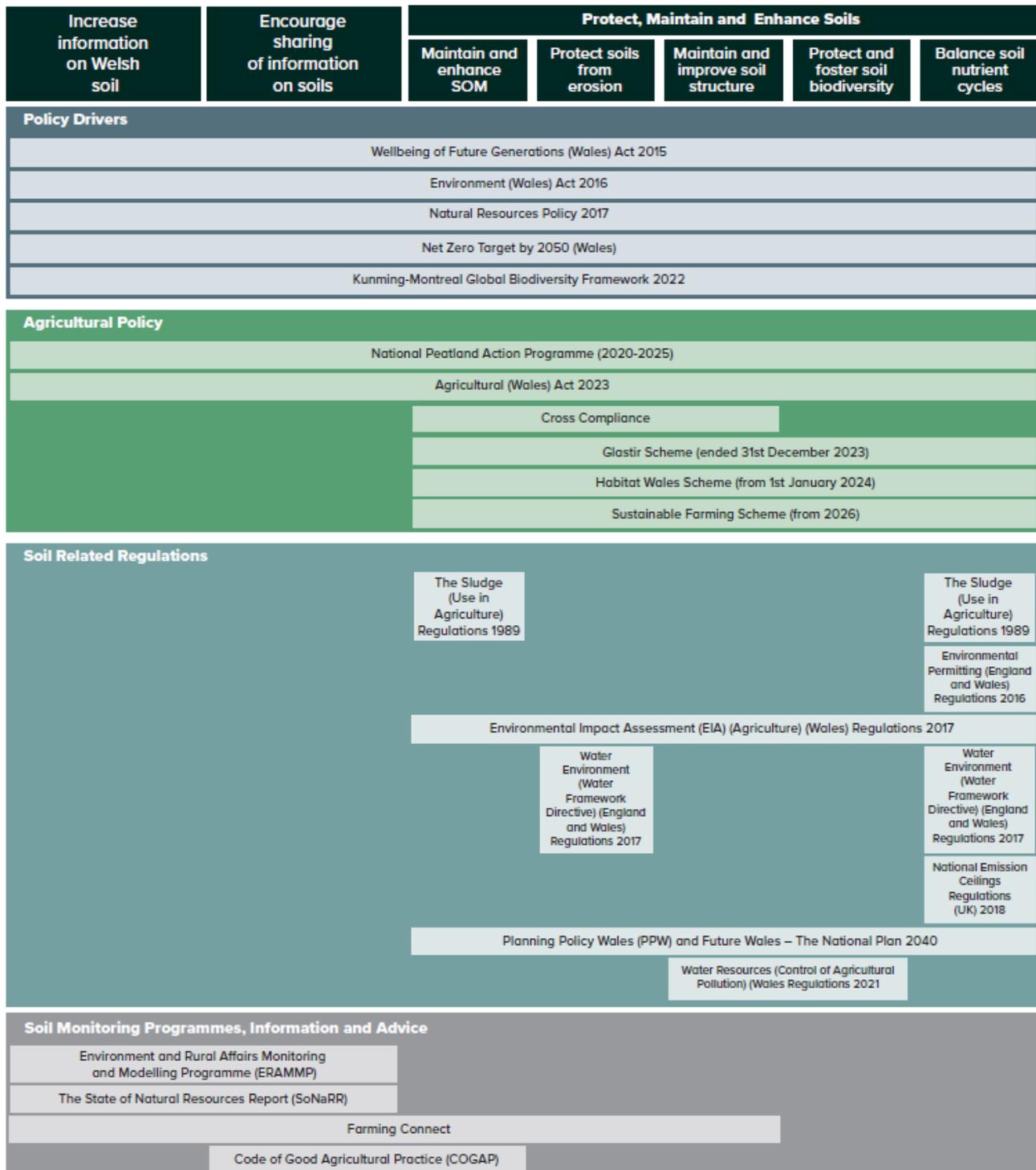


Fig. 2 An overview of the soil policy framework in Wales

Until the publication of the Agricultural Soil Policy Statement, there was no overarching soil policy for soil protection in Wales. There are policies relevant to soils in place, but they are spread across many policy areas and generally limited to specific functions or impacts of soils. This limits their combined effectiveness to protect soils. The Agricultural Soils Policy Statement seeks to provide a coherent vision and broad framework for sustainable soil management to address this gap. It does not set out new policy measures or contain detailed guidance for practitioners and it is not a regulatory document.

### **Specific Measures:**

Planning Policy Wales (PPW) Edition 12 sets out the land use planning policies of the Welsh Government. It is supplemented by a series of Technical Advice Notes (TANs), Welsh Government Circulars, and policy clarification letters, which together with PPW provide the national planning policy framework for Wales. PPW, the TANs, Mineral-TANs and policy clarification letters comprise national planning policy.

Future Wales the National development Plan 2040 is our national development framework, setting the direction for development in Wales to 2040. It is a development plan with a strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy, achieving decarbonisation and climate-resilience, developing strong ecosystems and improving the health and well-being of our communities.

BMV land, soil and peat policies and context feature in all documents and cover general development management, national infrastructure and mineral planning policies.

Future Wales Relevant Paragraphs & Chapters:

- Chapter 2 – states that (BMVAL) Agriculture Our productive land is a vital resource. Agriculture has shaped our landscapes and supported our rural and market towns for generations. We must continue to value and protect our agricultural land and ensure it can feed and support us.
- Policy 9 on Resilient Ecological Networks and Green Infrastructure identifies BMVAL and carbon rich soil dependencies.
- Policy 18(11) Renewable and Low Carbon Energy Developments of National Significance - there are acceptable provisions relating to

the decommissioning of the development at the end of its lifetime, including the removal of infrastructure and effective restoration.

PPW Relevant Paragraphs & Chapters:

- 3.58- 3.59 The Best and Most Versatile Agricultural Land
- 5.14.29 – 5.14.30 Peat (mineral planning)
- 5.14.40 – 5.14.55 Soil (mineral Planning)
- Chapter 6: Desired Distinctive and Natural outcomes will be based on sustaining and creating places in which opportunities in all areas to improve the resilience of ecosystems are taken by addressing problems such as, building on floodplains, diffuse pollution, soil compaction and sealing, ensuring the protection of peat resources and improving approaches to coastal flood defence in urban areas and coastal margins.
- 6.4.15 – The Step-Wise Approach 1a and 1b relating to irreplaceable peat habitats and long undisturbed soils.
- 6.4.34 – Peat soil

Legislation, Technical Advice & Circulars:

- Dear Chief Planning Officer Letter: [Best and most versatile agricultural land and solar PV arrays | GOV.WALES](#)
- [Technical Advice Note 6](#) – Chapter 6 (BMVAL) and Annex B (Consultation arrangements with Welsh Government).
- [Mineral-Technical Advice Note 1](#) – Aggregates – Chapter D – Restoration and Aftercare – Soil Handling and Reuse.
- [Schedule 5 of the Town and Country Planning Act 1995](#) – beneficial after use – minerals.

**Sustainable Farming Scheme:** Soil is expected to feature directly and indirectly through the Universal, Optional and Collaborative layers of the Sustainable Farming Scheme, including a universal requirement for soil testing (minimum of 20% per year) supported by provision of advice through Farming Connect. This is intended to raise farmers awareness of the condition of their soil to support

positive management actions. Universal actions will also support soils by proxy through habitat management requirements and the preparation of designated site management plans. Further actions to improve soil health, prevent erosion and compaction, and safeguard carbon stocks will be supported directly through specific soil Optional Actions and indirectly through other Actions related to trees, water and habitats.

The SFS will include the Good Agriculture and Environmental Condition Requirements of the single farm payment system to protect soils from erosion and compaction (GAEC 4 and 5).

We continue to work with farmers and stakeholders, collaboratively to ensure soil health is recognised in SFS as a foundation of sustainable food production and in the role it plays in carbon storage and sequestration. The final Scheme Details are intended to be published this summer.

### **Farming Connect:**

Funded by the Welsh Government through the Rural Investment Scheme (RIS), Farming Connect, a Knowledge Transfer Programme available across Wales, is a vital element of the support that Welsh Government provides to agricultural businesses.

Several interventions relevant to soils are available through Farming Connect including the Advisory Service which provides subsidised 1:1 bespoke, confidential advice from a FACTS<sup>6</sup> qualified advisor – the intervention includes taking and analysing 15-20 soil samples plus a detailed nutrient management plan based on the results.

Farming Connect also provides support via one-to-many interventions including Discussion Groups looking at the importance of soil health and structure. Topics covered to date include the Principles of Soil Health; Principles of Plant Species Diversity; Role of Soil Biology & Livestock in Promoting Pasture Productivity; Management Techniques to promote water storage and carbon sequestration; and Multispecies Leys & Cover Crops. Masterclasses, workshops including a mixture of theory and practical learning for attendees, have focussed on soil health and encouraging soil analysis and topics covered included regenerative farming practices and grassland management.

The Farming Connect demonstration network of farms – Our Farms – have delivered 40 projects across 15 farms looking at how to improve soil health. All of

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<sup>6</sup> FACTS Scheme

the information gathered, and techniques used are disseminated to farmers from across Wales via open days, technical factsheets, podcasts and information videos.

An extension to the current service contract through to Spring 2026 will ensure continued provision and support the introduction of SFS in 2026. Work is ongoing to develop the future offer from Farming Connect.

### **The UK Forest Standards:**

The UKFS provides additional information in Chapter 8 on forests and soil recognising their fundamental role in farmland ecosystems. As with agricultural soils, it recognises that soil is a vital but fragile resource that must be used in a sustainable way by knowing and working to soil type and condition.

### **The National Peatland Action Programme:**

Peatlands support a variety of habitats and species, they capture and store carbon, regulate greenhouse gas emissions, maintain biodiversity, and regulate water flows and quality. Funded by Welsh Government, this programme was set up to stimulate, coordinate, and deliver peatland restoration action in Wales.

Peatland restoration action took place on over 3,000 hectares in the first four years (2020-24) meaning the programme surpassed its initial 5-year restoration target. Welsh Government actions for the peat policy area in the Climate Adaptation Strategy for Wales (2024) include increasing the annual rate of restoration to deliver 1,800ha of peatland restoration p.a. by 2030 and ultimately 45,000 ha of restoration by 2050.

## 6. The Potential for Legal Frameworks and Targets for Soils.

Looking to the future, ERAMMP national monitoring, SoNaRR, the Soil Policy Evidence Programme and joint research with Defra will all continue to help inform the Welsh Government approach to protecting soils and productive land. A changing climate will necessitate a flexible approach to address land use change, organic matter, nutrients, wetness and aridity.

Soil will be an important consideration in the development of the Sustainable Land Management indicator and targets framework. Indicators and targets are to be laid before the Senedd by end of this year. Indicators will be developed with stakeholders over the summer.

The Control of Agricultural Pollution Regulations review published on 31 March 2025 considered the role of soil and soil management for all agricultural land in Wales. It identified poor soil management as a significant risk to pollution to water. This is through soil run-off, a significant mechanism for nutrient losses and sedimentation, and the condition of the soil. Both factors have a significant impact on the ability of a crop to utilise the nutrients applied, therefore increasing the risk of pollution.

The review identified that there was a lack of legislative protection for soils in Wales, where they were a feature in other parts of the UK and recommended measures to reduce the risk of soil loss to the environment. The recommendations will be taken forward in full.

- Recommendation 6 (short term): Include requirements within the Control of Agricultural Pollution regulations to protect against soil loss to the environment, potentially replicating the Good Agricultural and Environmental Condition (GAEC) requirements of Cross Compliance.
- Recommendation 7 (medium term): Consider the role of higher risk cropping on potential losses of soil to the environment and effective mitigation techniques such as buffer strips.

Huw Irranca-Davies AS/MS  
Y Dirprwy Brif Weinidog ac Ysgrifennydd y Cabinet dros  
Newid Hinsawdd a Materion Gwledig  
Deputy First Minister and Cabinet Secretary for Climate  
Change and Rural Affairs

Ein cyf/Our ref: MA/HIDCC/0636/25

Andrew R T Davies MS  
Chair  
Economy, Trade and Rural Affairs Committee  
Welsh Parliament  
Cardiff Bay  
Cardiff  
CF99 1SN

1 May 2025

Dear Andrew,

Further to my letter of 25 March 2024. I am writing to inform the Committee that I have given my consent to the Minister of State to lay the Official Controls (Extension of Transitional Periods) (Amendment) Regulations 2025 in relation to Wales. I have laid a Written Statement which can be found at:

<https://laiddocuments.senedd.wales/ws-ld17140-en.pdf>

Consent has been given for the UK Government to make these Regulations to avoid a gap between easements ending, and new policies coming into effect. This ensures that certain EU SPS goods are not subject to default official controls from 1 July 2025. The Regulations intersect with devolved policy and will apply to Wales. The Statutory Instrument (SI) is subject to the negative procedure and was laid before Parliament on 29 April 2025.

I am writing in similar terms to the Chair of the Legislation, Justice and Constitution Committee.

Yours sincerely,



**Huw Irranca-Davies AS/MS**

Y Dirprwy Brif Weinidog ac Ysgrifennydd y Cabinet dros Newid Hinsawdd  
a Materion Gwledig  
Deputy First Minister and Cabinet Secretary for Climate Change and Rural Affairs

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Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

—  
**Economy, Trade, and  
Rural Affairs Committee**

Tonia Antoniazzi MP

Chair, All-Party Parliamentary Group on Modern Languages

Baroness Jean Coussins

Co-Chair, All-Party Parliamentary Group on Modern Languages

1 May 2025

Dear Tonia and Jean,

**Proposed closures in languages and cultures at Cardiff University**

Thank you for your letter of 3 April regarding the proposed closure of degrees in languages and cultures at Cardiff University.

While we note your concerns it is not the responsibility of Senedd Committees to carry out economic impact assessments.

You may be aware that the Senedd's Children, Young People and Education (CYPE) Committee and the Culture, Communications, Welsh Language, Sport, and International Relations (CCWLSIR) Committee are carrying out inquiries which relate to the issues you have raised. The CYPE Committee is carrying out a short inquiry into issues facing the Higher Education Sector, and is due to receive evidence from Cardiff University in June.

We are currently keeping a watching brief on the situation in Welsh Higher Education and intend to follow the work of these Committees, and will pursue issues as necessary regarding any concerns raised around the potential economic impact of the proposed closures.

I have copied this letter to Buffy Williams MS and Delyth Jewel MS in their roles as Chair of the Children, Young People and Education Committee, and the Culture, Communications, Welsh Language, Sport, and International Relations Committee respectively.



Kind regards,

Andrew RT Davies

Andrew RT Davies MS

Chair: Economy, Trade and Rural Affairs Committee

We welcome correspondence in Welsh or English

CC:

Chair, Children, Young People and Education Committee

Chair, Culture, Communications, Welsh Language, Sport, and International Relations Committee

# UK-EU Parliamentary Partnership Assembly: Fifth meeting summary report

May 2025

The Parliamentary Partnership Assembly (PPA) is a formal body established under the UK-EU Trade and Cooperation Agreement (TCA). It plays an important role in overseeing the implementation of the TCA and all subsequent UK-EU agreements.

The fifth meeting of the PPA took place in Brussels on 17-18 March. This report provides a summary of the issues discussed of importance to Wales.

Delyth Jewell MS, Chair of the Culture, Communications, Welsh Language, Sport and International Relations Committee and Hannah Blythyn MS, a member of the Economy, Trade and Rural Affairs Committee participated in the fifth meeting and the report has therefore been agreed by them in that capacity.



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## 1. Roles and responsibilities

The UK-EU Trade and Cooperation Agreement (TCA) provides for the establishment of a UK-EU Parliamentary Partnership Assembly (PPA) as part of its governance structure, referred to as the ‘institutional framework’. This framework will oversee the TCA and all subsequent UK-EU agreements.

The TCA provides that the PPA should include members of the European Parliament and UK Parliament. The PPA has an important role to play in providing oversight of the implementation of the agreement.

It is the only body that can jointly hold the TCA Partnership Council to account. The Partnership Council is the body with overall responsibility for the TCA. It is made up of European Commission representatives and UK Government Ministers.

The PPA:

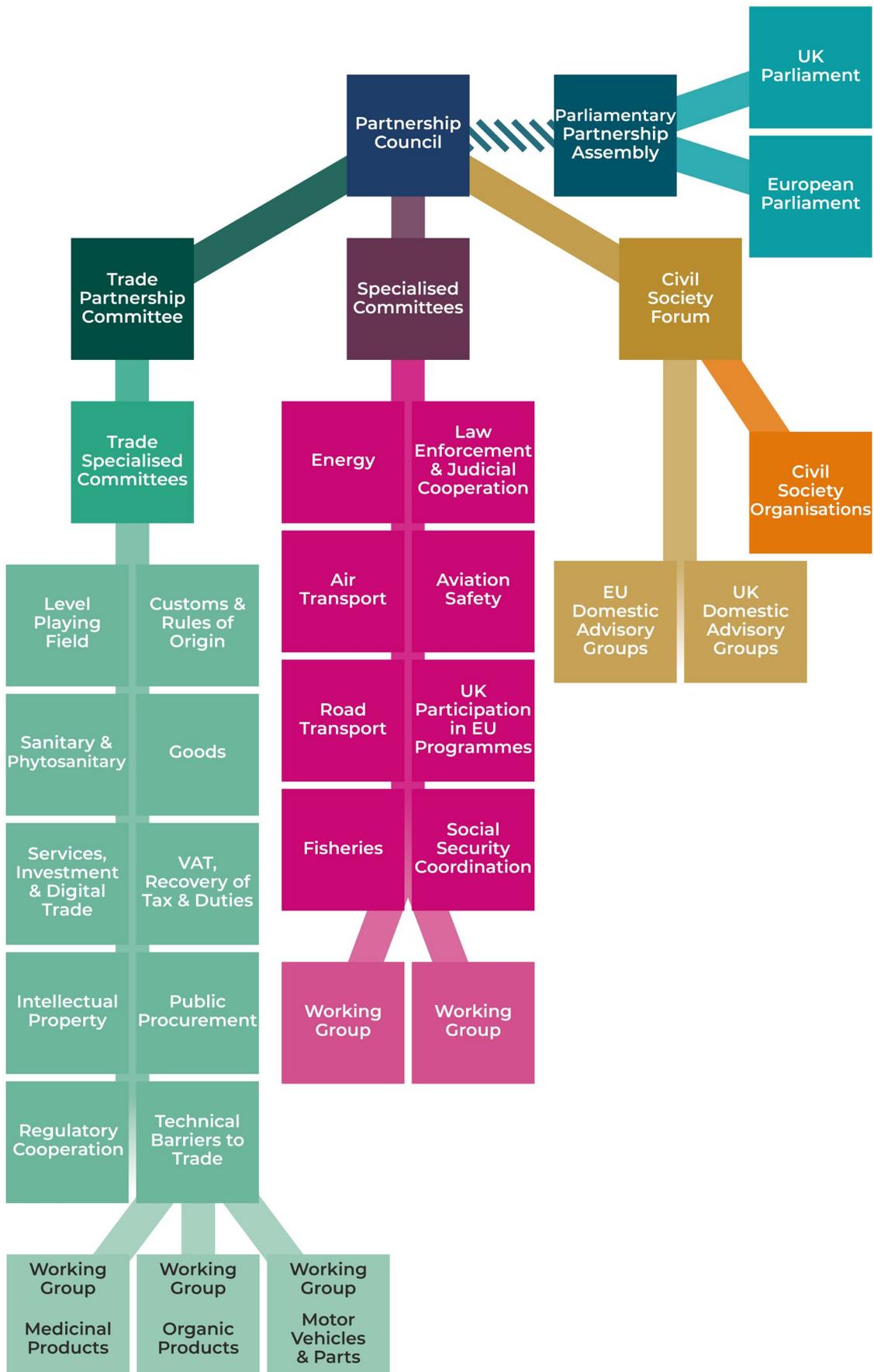
- can request information on the TCA and future UK-EU agreements from the Partnership Council, which must provide the information;
- must be informed of decisions and recommendations of the Partnership Council; and
- may make recommendations to the Partnership Council.

The PPA has also adopted its own rules of procedure since its establishment which set out how it will operate in practice.

The PPA is chaired jointly by a representative of the UK Parliament and of the European Parliament. The current co-Chairs are Marsha de Cordova MP and Sandro Gozi MEP. A full list of [UK](#) and [European](#) parliament delegations can be found on their respective websites.

The infographic below shows where the PPA sits within the TCA’s overarching institutional framework.

## Trade and Cooperation Agreement: Institutional Framework



## The role of the Senedd

The TCA does not provide a formal role for the UK's devolved legislatures, the EU's regions and cities, nor for civil society in the work of the PPA.

However, given that large parts of the TCA fall within areas of devolved competence or have an impact on them, the rules of procedure adopted allow for the devolved legislatures to be invited to attend meetings as observers.

Representatives with observer status do not have ordinary speaking rights during Plenary sessions and have no voting rights.

The Senedd was invited to send two Senedd Members to the PPA. The Senedd's Chairs' Forum has decided that, given their respective remits, the Senedd should be represented by the Chair or a Member of the Culture, Communications, Welsh Language, Sport and International Relations Committee and the Chair or a Member of the Economy, Trade and Rural Affairs Committee.

The proceedings are available to view on the [European Parliament website](#).

## Senedd Member contributions

Senedd Members were asked to contribute to one Plenary agenda item of their choice and to participate fully at breakout groups.

### Plenary

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Delyth Jewells MS contributed to the Plenary agenda item on youth opportunities. She said:

*At the Senedd, we hear time again how youth opportunities open doors to the world.*

*In November, my Committee which leads on culture and international relations, was here in Brussels to publish our report on the effects of Brexit on the culture sector, highlighting particularly for the first time the generational effects on young and emerging artists in Wales.*

*Our sectors are telling us how keenly they feel the loss of Erasmus+ and Creative Europe. They are calling on the UK to rejoin these schemes.*

*Baroness Bull was right when she spoke of “an opportunity hit for young people”. I’d add my voice entirely to her comments made earlier.*

*I’m sure we have all heard similarly heartbreaking stories – where young people are forced not to pursue new ventures, not to make life-changing connections, because those doors are now closed to them.*

*We support fully this Assembly’s predecessor’s recommendation recognising the situation is particularly challenging for young people. I hope we can take that further.*

*We must show them we can find solutions for their futures. If we cannot, we risk further alienating an entire generation. Because so much of what is being lost is not captured in graphs or statistics. Chances not taken, connections never made, lives unchanged for the better.*

*We owe it to young people today and to future generations not to become casualties of our carelessness. We owe it to them to offer hope.*

Baroness Deborah Bull, who gave evidence to the Committee’s inquiry, said:

*One additional mechanism for cultural exchange that’s often overlooked is Creative Europe, the EU’s flagship programme. The UK and its cultural organisations were highly valued partners and it had a major impact on projects in the UK’s nations and regions.*

*So, I echo the Welsh Senedd’s excellent Culture Shock report, as well as colleagues in Creative Scotland, who are calling for consideration of the UK’s reassociation to Creative Europe as these youth opportunities discussions move forward.*



*Hannah Blythyn MS and Delyth Jewell MS during the Plenary session*

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### **Breakout group: Data protection and AI**

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Hannah Blythyn MS participated in the breakout group on data protection and AI.

Delegates acknowledged the UK and EU's different approaches to AI regulation, and debated the threats and opportunities this brings. There was agreement that the current global situation, particularly developments in the US and China, could require the UK and the EU to cooperate and concerns were shared that multiple legal frameworks may offer opportunities for bad actors.

Hannah highlighted the Economy, Trade and Rural Affairs Committee's recent AI inquiry and emphasised that workers' voice and social dialogue are central to AI's impact on democracy and the workplace.

Delegates called for joint investment in research and development, and for urgent action.

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### **Breakout group: Climate and energy cooperation**

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Delyth Jewell MS participated in the breakout group on climate and energy cooperation.

There was widespread acknowledgement that climate change harms the economy. Delegates supported the need for greater climate diplomacy in addition to existing commitments on energy security, decarbonization and

supply, including decoupling from Russian oil and gas. Supply chain due diligence was also highlighted as an important issue, as were the implications arising from the US' withdrawal from the Paris Agreement.

Delyth emphasised the important role played by different communities in responding to adverse weather events, such as flooding and coal tip slides, and the need to support their transition to renewables.

Potential areas for deeper UK-EU cooperation were put forward for emissions trading systems (ETS), carbon border adjustment mechanisms (CBAMs) and reducing the energy transition skills gap.



*Delyth Jewell MS participating at the breakout group on climate and energy cooperation*

## 2. Key issues for Wales and the Senedd

The [Trade and Cooperation Agreement](#) sets the terms for the UK-EU relationship after the Withdrawal Agreement withdrew the UK from the EU. Many of its provisions either fall within devolved competence or affect areas within devolved competence, from fisheries to healthcare cooperation.

More information about what these are, how these affect Wales and the role of the PPA is available in [Senedd Research guides](#) on the agreement.

## State of play

The European Commission's Commissioner for Trade and Economic Security, Maroš Šefčovič, and the UK Government's Minister for EU Relations, Nick Thomas-Symonds, provided an update on the state of play from the Partnership Council. They each took the opportunity to set out their respective priorities for UK-EU relations.

Commissioner Šefčovič outlined several key issues for the EU, including citizens' rights, and three broad priority areas for "enhancing strategic cooperation with the UK". These were security and resilience, "people to people contacts", including youth mobility, and the "protection of the planet and its resources".

UK Minister for EU Relations, Nick Thomas-Symonds MP, highlighted the UK Government's three priorities of security, safety and prosperity. He said the UK Government was ready to negotiate a security and defence partnership and also an SPS agreement. He reiterated the UK Government's red lines not to return to the EU's Single Market, customs union or to freedom of movement.



*Hannah Blythyn MS and Delyth Jewell MS with co-Chairs Marsha de Cordova MP and Sandro Gozi MEP*

## Specific areas of cooperation

Over two days, the PPA debated specific areas of UK-EU cooperation of importance to Wales and the Senedd:

- Delegates emphasised the important role played by the UK and EU in **foreign policy, security and defence**, including through NATO, and in promoting peace and stability. They reaffirmed their support for Ukraine in the face of Russian aggression and for a lasting peace.
- On **trade, customs and sanitary and phytosanitary (SPS)**, delegates welcomed the TCA's provisions on cooperation, level playing field,

procurement, zero-tariff zero-quotas, regulatory cooperation on subsidies and sustainable development. Delegates agreed that the parties' work closely together, including that TCA committee meetings provide useful forums to resolve issues, check shared understanding and to pre-empt issues arising. Successes were outlined alongside recognition that there is room for improvements. UK delegates noted areas for improvements include an SPS agreement, mutual recognition of professional qualifications and for touring artists and there were calls for the UK to reexamine its red lines. The importance of Welsh exports, including lamb exports, was raised by Monmouthshire MP, Catherine Fookes.

- Delegates expressed widespread support for increasing **youth opportunities** and received an update from the European Economic and Social Committee (EESC) on its work. There were calls from both delegations for the UK to rejoin Erasmus, for a reciprocal strong youth mobility partnership and for a cultural exemption and reciprocal visa waiver for creative industries. Delegates from both parties' regretted the conflagration of mobility with freedom of movement. Delegates noted the need for arrangements to be broader in scope than university schemes and to include people from low-income and disadvantages backgrounds. In this regard, the EESC noted there are important lessons to be learned on inclusivity from the Welsh Government's international exchange programme, Taith.

### 3. Recommendations

Devolved legislatures have much to contribute to the PPA and our positive contributions to the breakout groups represent a valuable opportunity to raise issues and good practice from Wales.

To further develop the relationship between the Senedd and the PPA, we recommend:

**Recommendation 1: The Chair and Vice-Chair of the UK delegation should explore hosting a meeting of the PPA in a devolved nation.**

**Recommendation 2: We welcome the opportunity to contribute to breakout groups and to address the Plenary for one agenda item of our choice. However, we continue to press for devolved representatives to participate fully where devolved matters are engaged.**

**Recommendation 3: We reiterate Recommendation 3 from a previous report, that Senedd representatives and relevant Senedd committees work together to develop informal relationships with UK and EU delegation members outside of the formal PPA meetings on areas of common interest.**

**Recommendation 4: As with previous reports, this report will be shared with relevant Senedd committees and the Welsh Government.**



*Delegates of the UK-EU Parliamentary Partnership Assembly*

# Agenda Item 5.4

Rebecca Evans AS/MS  
Cabinet Secretary for Economy, Energy and Planning  
Ysgrifennydd y Cabinet dros yr Economi, Ynni a Chynllunio



Llywodraeth Cymru  
Welsh Government

Andrew RT Davies MS  
Chair of Economy, Trade, and Rural  
Affairs Committee

[SeneddEconomy@senedd.wales](mailto:SeneddEconomy@senedd.wales)

8 May 2025

Dear Andrew

I am writing to inform you, in line with the inter-institutional relations agreement, that a meeting of the Inter-Ministerial Group on UK-EU relations is scheduled for 12 May 2025

The meeting will discuss the reset between the UK and the EU and the summit on 19 May

Yours sincerely,

**Rebecca Evans AS/MS**  
Cabinet Secretary for Economy, Energy and Planning  
Ysgrifennydd y Cabinet dros yr Economi, Ynni a Chynllunio

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Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

Rebecca Evans AS/MS  
Cabinet Secretary for Economy, Energy and Planning  
Ysgrifennydd y Cabinet dros yr Economi, Ynni a Chynllunio

Llywodraeth Cymru  
Welsh Government

Eich cyf/Your ref:  
Ein cyf/Our ref:

Mike Hedges MS  
Legislation, Justice and Constitution Committee  
Welsh Parliament  
Cardiff Bay  
Cardiff  
CF99 1SN

8<sup>th</sup> May 2025

Dear Mike,

In accordance with the inter-institutional relations agreement, I am writing to notify you that a Memorandum of Understanding between the Department for Work and Pensions and Welsh Government was published on 29<sup>th</sup> April 2025. It can be found [here](#).

This Memorandum of Understanding sets out a clear set of conditions and principles for joint working between the Department for Work and Pensions and Welsh Ministers for the overall delivery of the Economic Inactivity Trailblazer in Wales (the “Trailblazer”) and covers the following:

- Aims of the Trailblazer
- Funding/Payment Schedule
- The principles of collaborative working

I have also copied this letter to the Cabinet Secretary for Social Justice, Trefnydd and Chief Whip, Jane Hutt MS, and the chairs of the Equality and Social Justice Committee, and the Economy, Trade, and Rural Affairs Committee.

Yours sincerely,



**Rebecca Evans AS/MS**  
Cabinet Secretary for Economy, Energy and Planning  
Ysgrifennydd y Cabinet dros yr Economi, Ynni a Chynllunio

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Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

# Agenda Item 8

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