



Digging the Dirt – Improving Wales' Soil Health

Response to the ETRA Committee report

On 18 November 2025 the Economy, Trade and Rural Affairs Committee submitted its report on Digging the Dirt – Improving Wales' Soil Health and I thank the committee for undertaking this inquiry.

The report includes 7 recommendations and 6 Conclusions, and this is the Welsh Government's response.

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1. Introduction

I thank the members of the Economy, Trade and Rural Affairs Committee for submitting its report on Digging the Dirt – Improving Wales' Soil Health. I have set out my response to the Report's individual recommendations and conclusions below. These have been grouped by Report chapter.

2. Response to the 7 Recommendations and 6 Conclusions

Chapter 3: Soil Monitoring

Conclusion 1

The Committee concludes:

The Committee was pleased to hear that Wales is a leader in soil testing. The Welsh Government must work to ensure that lead is retained. To do this it should examine best practice around information sharing from the Northern Ireland Soil Nutrient Health Scheme and look at how the data capture can be widened to include increasing the depth of soil samples taken as part of ERAMMP and improving soil biodiversity monitoring.

Response: Accept in Principle

Welsh Government is undertaking a review of monitoring to ensure future monitoring activity meets the requirements of the Agriculture Act. The review will consider the soil monitoring methods including soil depth and soil biodiversity. Wales is the only UK Nation that's mapped using eDNA technology its entire soil biodiversity communities.

Financial Implications: the review will be accommodated within existing budgets including an assessment of the additional cost associated with soil monitoring at depth and soil biodiversity monitoring.

Recommendation 1

The Committee recommends that:

Soil testing as part of the Sustainable Farming Scheme is a great opportunity to increase our understanding of soil. Welsh Government must ensure it shares soil health data both from those tests and any testing it commissions with farmers and other land managers in the most accessible way for them to improve their local management of soil health. They should also look at how data from tests undertaken as part of the SFS can be shared with experts to increase the understanding of our soil health regionally and nationally – whilst respecting privacy and commercial confidentiality.

Response: Accept in Principle

Results from SFS UA1 Soil Health will be shared with the ERAMMP contractor to support our national monitoring programme, this will increase the

understanding of soil health regionally and nationally. The results will be aggregated and the ERAMMP data will be published respecting privacy of data. Monitoring undertaken by the ERAMMP National Field Survey is to track trends in the condition and extent of natural resources and not to assist farmers and land managers with local management of soil health; knowledge transfer is addressed in the response to Conclusion 2.

Financial Implications: this work will be accommodated within existing Welsh Government budgets.

Chapter 4: The Sustainable Farming Scheme

Recommendation 2

The Committee recommends that:

The Welsh Government must ensure it is fully encouraging and supporting tenant farmers to improve the soil they are farming. This could include financial support and supporting them to obtain certifications that will increase the value of their products.

Response: Accept in Principle

Our varied and important tenant farmer sector has been central to Scheme design throughout. For example, earlier proposals that SFS should run as a five-year contract were amended as this would be inaccessible for many tenants.

The Welsh Government has worked through the detail of each Universal Action (including UA1 soil testing) with the SFS stakeholder group and Ministerial Roundtable, to identify and resolve any unique challenges for tenant farmers entering the SFS. The Tenants Farmers Association (TFA) are active members of both of these groups.

Future development of soil related optional actions will take account of tenant farmers. For 2026/27, organic support actions will be available to eligible farmers, both in and out of SFS.

Financial Implications: this work will be accommodated within existing Welsh Government budgets.

Conclusion 2

The Committee concludes:

We welcome soil testing requirements in the Sustainable Farming Scheme, however the Welsh Government must ensure the results are acted on via

funding, or advice and guidance on how farmers can improve their land, or a combination of the two.

Response: Accept

Whilst the cost of the actual soil testing will not be covered by Farming Connect from 1 April 2026 for those in the Sustainable Farming Scheme (to avoid double funding), farmers have and continue to be able to access subsidised advice and guidance from Farming Connect on the interpretation of any soil testing results. This advice is provided in order to support farmers to not only test soil, but to take informed actions based on those tests' results.

Support will include, amongst other things, guidance on selecting optimal cropping systems and rotations including recommendations on establishment methods; advice on grazing strategies, conservation management, and effective forage utilisation; best practices to lower greenhouse gas emissions and pesticide use; raising awareness of soil value and vulnerability; and advice on manure storage and utilisation, including timing and planning to meet regulatory requirements, as well as assistance in developing nutrient management plans that consider both environmental and agronomic factors.

Financial Implications: this work will be accommodated within existing budgets.

Conclusion 3

The Committee concludes:

The next Government should examine the Nature Friendly Farming Network's suggestions for improving soil health and consider how they could be incorporated into future iterations of the Sustainable Farming Scheme.

Response: Accept in principle

Much of the Nature Friendly Farming Network (NFFN)'s suggestions already form part of the initial SFS offer. Work has begun to scope the future SFS soil offer as part of the SFS Phase-2 Development Programme. We will continue to work with the NFFN and other stakeholders to develop this offer.

Financial Implications: this work will be accommodated within existing budgets.

Chapter 5: Best and Most Versatile Agricultural Land

Recommendation 3

The Committee recommends that:

The Welsh Government should develop a framework to support planning officers making decisions on applications for use of agricultural land. This framework should be developed with the aim of retaining the best land for agricultural use, set priorities between uses and be future proofed from a climate change perspective.

Response: Reject

Planning Policy Wales and Technical Advice Notes provide the land use planning framework when considering the use of agricultural land. The balance between the protective provisions afforded BMVAL and its use for non-agricultural purposes is broadly correct and can only be assessed on a case-by-case basis.

Paragraphs 42 to 48 conflate the BMVAL classification and the ERAMMP broad habitat classifications; they are not the same and I refer the Committee to my oral Hearing evidence in paragraphs 362 & 363. ERAMMP is based on land use rather than capability. It does not reflect the versatility of land to grow a broad range of crops at consistent yields; nor does it reflect environmental considerations in terms of slope, soil type and porosity which influence erosion, crop recovery, workability and infiltration.

Financial Implications: none.

Recommendation 4

The Committee recommends that:

The Welsh Government should review the ALC data and maps to ensure they are still fit for purpose.

Response: Accept

The Welsh Government understands the need to maintain the credibility of the ALC system to protect high quality agricultural land in the planning system. It has put in place a series of measures to ensure the system remains up to date. In addition to my evidence at paragraphs 365, 378 and 379 of the Hearing transcript, I hope the following actions demonstrate to the Committee how this recommendation is being addressed.

The old Provisional ALC Maps were at 1:250,000 scale and based on an old version of the ALC assessment criteria dating from the last 1960s; these were withdrawn in Wales in 2017.

The Welsh Government first updated the ALC map in 2017 and again in 2019 - [Predictive Agricultural Land Classification \(ALC\) Map 2 | DataMapWales](#). Defra

are following the approach and methodology used in Wales to update their maps, with Welsh Government providing technical support into the project.

The Predictive ALC Map is based on the current ALC grading criteria on a 50m gridded approach suitable for all scales.

The Predictive ALC Map can only ever be predictive in nature, rather than definitive. A survey will always be required due to the inherent short variation in soil properties which influences the final grade and the propensity to challenge in the planning system where actual evidence, rather than predictive evidence, is required to inform planning decisions.

There is no indication that the ALC system is not fit for purpose under current climatic conditions and cropping systems. This is based on the findings of Defra research project [SP1104](#) and Welsh Government research project [CSCP06](#).

The following ALC Technical Review series of reports were commissioned by Welsh Government on behalf of England and Wales to review the technical grading criteria and provide a template for a full technical update and digital resources:

[Agricultural Land Classification: Technical Review - Part 1](#) slope, stoniness, soil depth & particle size distribution.

[Agricultural Land Classification: Technical Review - Part 2](#) aspect, frost, wind, micro-relief, flooding, irrigation & soil erosion.

[Agricultural Land Classification: Technical Review - Part 3](#) climate, drought, episodic events, evapotranspiration & land capability / suitability.

[Agricultural Land Classification: Technical Review - Part 4](#) potentially toxic element (PTE) concentrations.

[Agricultural Land Classification: Technical Review - Part 5](#) full technical review recommendations.

Under project RDE745, Defra and Welsh Government commissioned the full technical update of the ALC system with the technical review series forming the basis for the specification. The project began in August and will complete in 2027. As part of this project, the Predictive ALC Maps for England and Wales will be updated.

Financial Implications: this work will be accommodated within existing Welsh Government and Defra budgets.

Conclusion 4

The Committee concludes:

The Welsh Government should engage with DEFRA and follow the development and implementation of their Land Use Framework.

Response: Accept in principle

Welsh Government maintains a watching brief on the development of the Land Use Framework by DEFRA and is always looking for good practice it can learn from.

Future Wales, the National Development Plan, is currently undergoing its 5-year statutory monitoring period. Future Wales serves as the framework for guiding development in Wales over the next two decades, addressing pressing issues such as economic growth, environmental sustainability, and community health.

Financial Implications: this work will be accommodated within existing budgets.

Chapter 6: Regulation

Committee Recommendation 5

The Committee recommends that:

The Welsh Government should set out what its plans are to encourage farmers who do not engage with the Sustainable Farming Scheme to improve their soil health. As part of this it should detail its plans for regulation, including putting GAEC 4 and 5 on a statutory footing.

Response: Accept

GAEC 4 & 5 will apply to both BPS (Basic Payment Scheme) and SFS claimants.

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 whether in SFS, BPS or not in a scheme.

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.

The Welsh Government has invited the Law Commission to report on options to simplify and modernise agricultural law in Wales. The project was formally launched on 16 April 2024. The Law Commission has met with stakeholders and policy officials to conduct their analysis of agricultural related law, which is expected to be published before the end of 2025. Further information can be found on the Law Commission website: [Agricultural Law in Wales - Law Commission](#).

Financial Implications: this work will be accommodated within existing budgets.

Conclusion 5

The Committee concludes:

The Welsh Government should clarify exactly which GAECs will apply to SFS claimants.

Response: Accept

In addition to the to the response to Recommendation 5, the rules replacing Cross Compliance will be set out in the Universal Code. The [Sustainable Farming Scheme 2026: scheme description \[HTML\] | GOV.WALES](#) provides further information.

Financial Implications: this work will be accommodated within existing budgets.

Chapter 7: Targets

Recommendation 6

The Committee recommends that:

The Welsh Government should clarify the guidance around soil health. As part of this they should consider creating a voluntary minimum standard for soil health which they would then use to measure progress, with the possibility that this

voluntary standard could become a statutory minimum if progress is not achieved.

Response: Accept in principle

Welsh Government is developing a Sustainable Land Management (SLM) soil health indicator for Agriculture Act reporting. This will be used to measure progress towards delivering SLM and SMNR. The SLM soil health indicator will not create a voluntary minimum standard for soil health. Indicators and targets are to be laid before the Senedd by end of this year. Indicators will be developed for soil health with the need and efficacy of targets kept under review. Given the spatial variation in soil types and their behaviour to climate and land use, Welsh Government's is providing a layered approach to soil health with multiple actions through the universal SFS layer promoting soil health; bespoke advice through Farming Connect (see response to Conclusion 2); optional layer actions and capital equipment; and, the Universal Code and Control of Agricultural Pollution Regulations. Whilst not a voluntary minimum standard, ongoing monitoring in combination with SLM and scheme level indicators will provide a measure of progress against activity for Welsh Government to review its approach.

The extent to which this approach achieves the sustainable management of soils will be kept under review including whether further guidance around soil health is required.

Financial Implications: this work will be accommodated within existing budgets.

Chapter 8: Private Investment and the Soil Carbon Credit Market

Recommendation 7

The Committee recommends that:

The Welsh Government should, as a matter of urgency, ensure high quality advice is available for farmers exploring the carbon credit market.

Response: Accept in principle

We are committed to working with stakeholders and delivery partners to develop a nature finance framework for Wales. The BSI Nature Investment Standards programme establishes standards for high-integrity nature markets. Our Sustainable Investment Principles set out key principles for effective and responsible nature markets in Wales, such as community engagement.

Financial Implications: this work will be accommodated within existing budgets.

Conclusion 6.

The Committee concludes:

The next Welsh Government should review the private investment landscape, with a view to exploring the relative merits of moving from carbon credits to value chains.

Response: Accept in principle

The Welsh Government approach to nature finance / nature markets must be compatible with other work across the UK and aligned to international standards.

We are committed to working with stakeholders and delivery partners to develop a nature finance strategy for Wales, learning from the current private investment landscape. This includes identifying new, effective and evidence-based examples of good practice and capacity building from the UK and beyond, such as:

- Ecosystem Knowledge Network (EKN) hosted (with support from NRW and Office for the Future Generations Commissioner) a "Financing an Environment for Wales" event last October which brought together over 100 leaders from landowners, regulators, businesses, investors and banks.
- Welsh Government officials alongside its stakeholders have visited 2 projects in England to learn from the approaches taken there in relation to market opportunities.

Financial Implications: this work will be accommodated within existing budgets.