

Soil health – protecting, sustainably managing and restoring EU soils

Call for evidence - Feedback

Soil Strategy and further development towards a Soil Law may pose high challenges for the Member States with high proportion of organic soils and particularly peatlands and their wise use.

In its first chapters the document states many general needs and reasons for a common Soil Strategy. However, justification and the close synergies, even overlaps with other EU policies should be better described. Subsidiarity is a prerequisite in getting approval of the citizens in many Member States, where soil characteristics and also their utilization differs to great extent.

There are more than ten other EU strategies, plans, initiatives and existing policies, particularly on pollution and emission in place touching also soils. The awareness and actions for soil are already ongoing in the Member States as stated also in the text. Therefore one has to ask critically the role of the Soil Strategy in general.

An objective “*Significant areas of degraded and carbon-rich ecosystems, including soils, are restored*” can be interpreted in different ways, especially if we are to shift towards restoring all carbon-rich ecosystems. With high pressure on the protection and restoration of peatlands in many Member States we are suffering from being in a climatic zone where precipitation exceeds evaporation and peat is accumulating and peatlands are forming. Even if the Strategy would not yet be legally binding such a requirement can not be applied without setting some limits by e.g. percentages protected or restored etc..

Soil can “*act as a carbon reservoir*”, but also sequester carbon, and thus allowing wise use of the soil carbon stocks in a resource efficient and net positive manner. The definition of peatlands does not meet the current definition - at least 30 cm of peat - and distinction between organic soil and peatland (bog) easily disappears

“*Emissions from cultivated organic soils have still not decreased significantly due to the continuation of harmful cropping practices. Yet restoring drained organic soils alone could significantly reduce CO2 emissions from land, which comes with numerous co-benefits, for nature, biodiversity and water protection.*” The chapter has obvious implications to peatlands with most likely collateral damages and unwanted side effects, if the need for drainage is not put into equation and a question on how to substitute all the existing ecosystem services and benefits got fully answered.

Restoration targets especially on peatlands should not hamper GHG reduction targets. Emissions can be reduced effectively and faster also by other land use patterns, practising

Bioenergia ry
15.3.2022

paludiculture, afforestation where appropriate and in some cases also cultivation of perennials or other crops.

In the absence of criteria for the proportion of managed peatlands to be restored, the requirement to restore managed and drained peatlands may result in many disadvantages and to social challenges.

The suggested "*passport for excavated soil*" is unnecessary and only adding to the bureaucracy. It would also be contradictory to the principle of subsidiarity quoted earlier.

As EU is setting targets of Urban Greening and plans to achieve it, it is essential to know that without utilization of organic soils and peat that is unrealistic.

Protection of water resources and targets to meet good status of groundwater and water courses are best taken care of in EU water regulation (WPD), and there is no need to extend this to Soil Law. Sustainable Soil Management (SSM) practices is best known and applied at grass-root level, locally, not to be told from European level.

It would be up to the Member States to decide, if they spend their budget money on suggested "free" soil testing. It would be very hard to determine pan-european specifications for the test, because there are very different soils and aspects of soil usage i.e. how to interpret the results, what is the minimum "*free test standard*" etc. e.g for forest soils, garden soils, agricultural soils etc.