



Finnish Biocycle and Biogas Associations preliminary position on the directive on Soil Monitoring and Resilience

Finnish Biocycle and Biogas Association welcomes the new proposal of the European Commission for a directive on soil monitoring and resilience. The Finnish Biocycle and Biogas is a national Association interested in nutrient recycling and biogas promotion and correspond the production of recycled fertilizers.

Soils play an important role in the fight against climate change and biodiversity loss. Healthy soils provide essential ecosystem services such as food and biomass production, clean water, nutrient cycling, carbon storage and habitat for biodiversity. The aim of the initiative is important, because the lack of a dedicated legislation on soil has had led to a deterioration on soil health throughout Europe.

Digestate and recycled fertilizers are sustainable soil management practices that should be more widely adopted in agriculture. They help to reverse soil degradation by improving various soil ecosystem services. For example, they enhance crop yield and biomass production, create a habitat for biodiversity, increase carbon sequestration in the soil and reduce erosion and water loss.

We, Finnish Biocycle and Biogas Association, would like to share the following expert statements and we believe that there is room for improvement on certain aspects addressed by the Soil Monitoring Law.

USE OF RECYCLED FERTILIZERS

In the proposal soil health certification, the inclusion of anaerobic degradation/digestion as a remediation technique for contaminated sites and the recognition of the prioritization of circular solutions that enrich the organic content as a sustainable soil management principle are positive developments.

Finnish Biocycle and Biogas Association cannot overemphasize how important it is to identify sustainable soil management practices (Article 10). The practices of Appendix 3 are very significant in their effectiveness, we hope that attention will be paid to the implementation. We do not object if some obligations are imposed on their use.

BINDING GOALS

EU Soil Strategy's targets of having all soils in healthy states by 2050 may be challenging to achieve without legally binding goals in the adopted proposal (Article 1); Hence we propose to set legally binding goals.

We understand that the changes in soil condition towards healthy equilibrium state are usually slow and changes in management practices come up visible on a delay lag of even five or more years. For all that, there should be a clear roadmap, intermediary binding targets or mandatory national plans to ensure that the soil health objective is reached in due time.



VARYING CONDITIONS

The Finnish Biocycle and Biogas Association approach with reservations into the inclusion of harmonised soil descriptors and evaluation criteria which Member States have to use when monitoring soil health. Hence, we see it important that there is enough room for the definition for a healthy soil, so that it allow regionally adapted, based on science, criteria for the indicators.

Argument: Soils are very heterogeneous and environmental conditions vary a lot across the EU, even within a small area. Therefore, it can be difficult to find comprehensive indicators that handle, if the soil is really health or not, and if, the indicators are suitable for all soils or not. When setting threshold values (Annex 1), it would be important primarily to take into account the actual effects on the ecosystem. For example, too strict binding threshold values can make it difficult to use organic and recycled fertilizer products, especially in soils where the natural concentrations of a certain element are high for example due to high cation exchange capacity (CEC).

SOIL HEALTH CERTIFICATION

We see that soil health certification could increase the interest in sustainable soil management practices such as the prioritization of circular solutions that enrich the organic content and we find it good that the system is voluntary for the landowner. A certification scheme that will be developed in synergy with the carbon removal certification will also bring benefits and new opportunities for landowners, as they can be rewarded by the market for good soil stewardship, and receive financial support or incentives.

KNOWLEDGE AND DATA COLLECTION

We believe that better information on the innovative practices for sustainable soil management and regeneration is essential for Member States. This implies investing in research and various projects to translate knowledge into action. We also see that sustainable management practices should consider the economic impacts of the actions, and that they should not impose excessive costs on farmers who may need to change their machinery.

A lot of soil monitoring is already done in connection with the common agricultural policy and with the help of fertility samples, among other things. In the further processing of the proposal, attention must be paid to the fact that the administrative burden on farmers and landowners does not grow beyond control. Data collection must also be of real benefit to the landowners themselves.

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