

Brussels, 10<sup>th</sup> November 2021

Ref.: 26090/2021

Dear Executive Vice-President Timmermans,

Dear Commissioner Sinkevičius,

Dear Commissioner Wojciechowski,

Firstly, allow us to express our gratitude for your efforts in relation to the European Green Deal (EGD) and for giving priority also to the importance of soil protection, which from our perspective is crucial for achieving the ambitious EGD goals. As Commissioner Sinkevičius stated on numerous occasions **soil is literally a treasure under our feet, and our food and our future depend on it**. In this respect, we are looking forward to the EU Soil Strategy for 2030, which the Commission intends to publish in the coming weeks. Nevertheless, without prejudging the contents of the aforementioned strategy, we would like to point out the main issues that we are facing in relation to soil protection.

One of the main threats we are facing nowadays is **soil degradation**. Halting and reversing current trends of soil degradation must be our top priority. We need to keep in mind however that the EU has very versatile land and we need to fight all types of degradation in a strategic and targeted way, whether we are dealing with desertification, water erosion, salinity, mass movement or fertility decline. In this respect, we would mainly like to point out the **decline of organic matter** and the very important functions of soil, such as **water retention and carbon storage**. Healthy soils are the largest terrestrial carbon pool on the planet, which means that without using their carbon storage potential we will not be able to reach the EGD goals and become climate neutral by 2050.

The condition and structure of land is also responsible for co-creating **risks of landslides, floods and droughts**, but at the same time, can also reduce these risks to a very large extent. The active involvement of farmers, the forestry sector and the new standards of rainwater management, both in urban and rural areas can and should play a key role in the agenda of reducing these risks.

Soil is an irreplaceable resource, which is formed very slowly, only about two to three millimetres in 100 years. On the other hand, erosion processes and soil damage are in fact so large, that on average we lose one to two millimetres of soil per year, in some areas even more. **Soil loss due to erosion** has already occurred in many countries in Southern Europe, whereas countries in Central Europe are also on a similar path of degradation over the next 20 to 30 years, unless we change our approach. Despite everything, **soil has a huge regenerative capacity** and it is necessary to reduce its high year-on-year losses and help start its regeneration, for which there are, for example in agriculture, a few well-established practices. We also cannot forget to mention other important issues, such as soil biodiversity loss, local and diffuse contamination, soil sealing and soil compaction.

The Mission Board for Soil health and food stated in their 2020 report that around 60 to 70% of EU soils are not healthy. This is why we believe that progress and true **soil protection is a key prerequisite for a healthy planet**, which can only be achieved by the application of a common set of rules based on

an EU-wide legislative framework. **The setting of an EU soil protection framework** should not be based only on bans, orders, zoning and declarations of protected areas, but also on **aligning soil protection and management with an active and sustainable land management**, whether we are talking about agricultural land, forest land or urban land. Nevertheless, we should not aim for a “one size fits all” approach, but rather take into consideration national specificities as the soil structure in the EU varies. The carbon sequestration role of soils in combination with renewable energy aspects where organic matter produced on fields is taken away and is not returned to the soils should also be taken into consideration.

**We need to look at soil protection in an integrated and holistic way**, in order to assure the use of sustainable practices. The solution to most of these problems lies in a coordinated application of a range of soil protection measures, including anti-erosion measures, both adaptation and management (agrotechnical and forestry practices), including a range of water retention measures. In this respect, we also need to determine an effective system of planning, financial support and monitoring. An adequate set of indicators could give a better understanding of the situation and could contribute to achieving these goals, such as:

- soil carbon content,
- share of vegetation cover,
- increase of groundwater reserves and soil moisture,
- share of municipalities that have developed an integrated management plan of rainwater and the soil fund,
- share of actively cooled vertical and green areas, or share of permeable and new water areas in the urban environment,
- share of land areas and landscapes that were compacted and damaged by erosion and year-on-year changes in these parameters, including their overall cumulative balance in the country.

We acknowledge the fact that the Commission proposed a Soil Framework Directive in 2006, which was the first legislative approach the Commission has proposed on soil protection since its establishment. Due to a blocking minority of Member States this proposal had to be withdrawn, however the problems remain. We have tried to reverse these problems on the national level, but as these are global issues, we can only solve them together. In this respect, we welcome the efforts of the European Parliament, most notably the April 2021 Resolution on soil protection. Also, the European Environmental Agency in its 2020 state and outlook report stated that the absence of suitable EU soil legislation contributes to soil degradation within Europe and the Mission Board for Soil health and food estimated that the cost of inaction on soil degradation exceed 50 billion EUR yearly. We would have also welcomed a more thorough discussion with the Commission regarding the planned EU soil strategy for 2030 and urge the Commission to organise thorough discussions with Member States before publishing its strategies.

This is why we are of the opinion that the time is ripe to present a new framework legislative proposal for soil protection to create synergies with water, air, biodiversity, as well as with the CAP and EGD agendas. This should be based on at least a minimum harmonization of existing EU and national regulations and directives, as well as monitoring tools, in order to reach these synergies and to be able to better monitor our achievements.

Dear Commissioner, we are hopeful that you will take our concerns and proposal into consideration whilst finalising the EU Soil Strategy for 2030.

Yours sincerely,

**Samuel Vlčan**, Minister of Agriculture and Rural Development of the Slovak Republic

**Ján Budaj**, Minister of Environment of the Slovak Republic

**Céline Tellier**, Minister of Environment, Nature, Forests, Rural Areas and Animal Welfare on behalf of the Environment Ministers of Belgium

**Hristo Bozukov**, Minister of Agriculture, Food and Forestry of the Republic of Bulgaria

**Asen Lichev**, Minister of Environment and Water of the Republic of Bulgaria

**Costas Kadis**, Minister of Agriculture, Rural Development and Environment of the Republic of Cyprus

**Miroslav Toman**, Minister of Agriculture of the Czech Republic

**Richard Brabec**, Minister of Environment of the Czech Republic

**Artūrs Toms Plešs**, Minister of Environmental Protection and Regional Development of the Republic of Latvia

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