

CropLife Europe Position Paper on Soil Monitoring Law

- **The Commission’s proposal on Soil Monitoring and Resilience (Soil Monitoring Law) is a positive step towards increasing protection and enhancing the condition of soils across Europe. Nonetheless, this must be achieved while simultaneously ensuring farmers are adequately supported in facing the many challenges tied to agricultural productivity.**
- **An EU-wide soil monitoring framework must take into account soil use and soil function by introducing a land use category for “agricultural productive land”, which should include agricultural sustainability indicators.**
- **Properly incentivising farmers to engage in sustainable soil management can be achieved through introducing a gradual soil health score, as well as introducing a toolbox of best practices, as opposed to lists of mandatory practices.**

Soils are crucial for farm performance and productivity. As such, their functioning is a key priority for farmers. Soils can also support agricultural co-benefits such as climate change mitigation and biodiversity conservation. Accurate data on soil health are important to inform sustainable soil management as part of farmers’ integrated crop management (ICM).

Managing soil health is, however, not an easy task. The type of soil, the climate, the soil use, and several agricultural regulations influence the way a soil is managed. Farmers are currently faced with numerous challenges such as nutrient, water, pest, disease and weed management, as well as prevention of soil degradation due to erosion, compaction and salinisation. Farmers need to be sufficiently supported to address these challenges.

The Commission’s proposal can provide a framework within which harmonised data on soil health criteria can be defined, thus increasing the understanding of a healthy soil. This will not only help farmers improve their soil management but also inform agricultural policy and investments in innovation, such as the investment in digital agronomy and biopesticides, to which our members have committed as part of our 2030 Commitments, as well as new plant characteristics developed by biotechnology.

Agricultural Land Use

Introducing land use categories, as per the Commission’s proposal, will certainly benefit soil health. However, soils under natural land, semi-natural land, or artificial land are very different. Setting the same soil health indicator values for these different types of land would be counterproductive. Therefore, we propose including a category for “agricultural productive land”, where the physical, chemical, and biological condition of the soil have been optimised for the purpose of food or feed or production.

Productive agricultural land is the biggest land use category in the EU. In agriculture, soils are used by farmers to deliver on the social, environmental, and economic sustainability objectives of society. They are both a production factor in the farmers’ toolbox and a resource that needs to be efficiently

managed to maintain its production value. Soil function and soil health, therefore, need to be considered simultaneously.

A healthy agricultural soil should fulfil a set of chemical, physical, and biological indicators, coupled with simultaneously contributing to the desired farm sustainability. Therefore, we believe the proposal can be strengthened further by including agricultural sustainability indicators such as yield, product quality, social and economic well-being of farmers, climate change mitigation, restoration and conservation of biodiversity, and conservation of water resources, in the assessment of healthy soil.

Soil Health Definition

As per the Commission's proposal, a soil is deemed healthy when all pre-determined values of the proposed soil health indicators are met. Based on this definition, a farmer can have either healthy or unhealthy soil. However, in order to stimulate farmers to engage in sustainable soil management, a gradual score might be more practicable. This score should, as proposed above, also consider farm sustainability performance.

A gradual score can incentivise farmers to act and will reflect the complexity of soil health as currently many EU agricultural soils are considered unhealthy although in practice these soils show good agricultural performance.

Sustainable Soil Management

The Commission's proposal requires Member States to draft mandatory lists with sustainable soil management practices that must be implemented across their entire territory. While lists of proven practices can certainly play an important role in sustainable soil management, a toolbox of sustainable practices will be more effective for farmers than forcing mandatory practices upon them.

Moreover, farmers should be supported with access to soil monitoring and farm sustainability performance data, as knowledge on their performance would stimulate and enable them to make the right management decisions to further improve soil health and farm sustainability performance.

Introducing a toolbox of best practices on sustainable soil management instead of lists of mandatory practices will:

- leave agricultural soil management in the hands of the farm professional;
- ensure flexibility to align measures to specific farm conditions, thus being more effective;
- avoid creating a hurdle for innovation in sustainable soil management, as new practices can be used immediately, instead of needing to be registered to a Member State list;
- provide more possibilities to incentivise soil health and sustainability performance publicly or privately.

Cost-effective Measuring and Monitoring

Data on soil health and farm sustainability performance are essential for sustainable soil management in agriculture. The challenge for many soil health and farm sustainability indicators is being able to measure and monitor them cost-effectively. The Commission's proposal could contribute to this goal by including obligations for the Commission and Member States to provide or subsidise cost-effective measuring and monitoring for those indicators where the costs are still limiting farm-wide implementation.

Furthermore, as science and technology progress day by day, the Commission should be open to introducing new soil health indicators, proposed by the scientific community or Member States, as the Soil Monitoring Law is being rolled out.