



## **ESPP input to EU Public Consultation on “Soil health – protecting, sustainably managing and restoring EU soils”**

*Open to 16th March 2020*

[https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13350-Soil-health-protecting-sustainably-managing-and-restoring-EU-soils\\_en](https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13350-Soil-health-protecting-sustainably-managing-and-restoring-EU-soils_en)

**ESPP (European Sustainable Phosphorus Platform) supports the need for an EU Soil Health Directive, to address soil deterioration and loss, including nutrient pollution.** As indicated in the proposed roadmap document, this should take into account the current exceedance of planetary boundaries for phosphorus and nitrogen, and the Green Deal target to reduce nutrient losses by at least 50% whilst maintaining soil fertility.

ESPP notes that climate change will accentuate pressures on soil health, in particular increasing soil erosion. Combined with increased mineralisation in soil, this is expected to increase phosphorus losses from soil and reduce plant-available phosphorus in soil. See overview and supporting science in [www.phosphorusplatform.eu/Scope137](http://www.phosphorusplatform.eu/Scope137)

Nutrient recycling offers significant potential to support soil health, by return of organic carbon and nutrients to soil, in particular in digestates, composts and organic fertilisers. At present this is hindered by failure to progress towards inclusion of appropriate animal by-products (in particular manure) into the CMC criteria of the EU Fertilising Products Regulation (implementation and/or definition of ABP End-Points for CMCs for compost, digestate, CMC10, biochars ...). Also, the revision of the EU Sewage Sludge Directive should enable return of nutrients and organic carbon to soils whilst ensuring strict criteria for limiting contaminants and applying nutrients according to crop needs – as should manure spreading limitations under the Nitrates Directive and via the Common Agricultural Policy.

ESPP underlines that soil health is key to achieving the EU's water policy objectives (Good Quality Status under the EU Water Framework Directive) by limiting nutrient loss and soil erosion, and so eutrophication.

Soil health is closely linked to, and should be taken into account in, EU chemicals policies, by risk reduction measures or bans of chemicals susceptible to contaminate soil, in particular PFAS/PFOS, mercury and other remanent industrial or consumer chemicals susceptible to reach soil via air or water, including pharmaceuticals, veterinary pharmaceuticals and agrochemicals. Continuing research is also needed into analysis of, risk assessment and prevention of micro-plastics.

ESPP considers that a Soil Health Directive is important to ensure fair competition within Europe: companies may otherwise face differing costs between Member States with differing constraints on land take or on pollutant emission limitation, farmers may otherwise face differing land use and nutrient stewardship requirements. The Directive should also ensure comparable constraints, including level cost playing field, for imported products, in order to avoid “export” outside the EU of soil degradation related to EU consumption of food, animal feed or consumer products.