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EU Soil Health Law "Call for Evidence" (16. February – 16. March 2022)
Statement of the German Soil Association (BVB e.V.)

15. March 2022

The German Soil Association e.V. (BVB) welcomes that the European Commission will install a Soil-Health-Law and underlines the importance of soil as a limited resource. To our opinion the following measures are essential for the preservation of soils and their natural functions:

- Soils are one of the world's hotspots for biodiversity. Therefore its protection, which has been neglected until now, must be integrated into all policy areas.
- In order to obtain comparable data on changes to the soils across the EU, permanent observation and monitoring plots must be established across the whole territory. Changes in soil properties (e.g. organic carbon contents) can only be monitored in long-term.
- There is an urgent need for indicators of soil health and mandatory target values.
- Preventive measures for soil protection are more cost-effective than the removal of pollutants, contaminants, pesticides and soil compaction.
- The principles of good farming practice must be adapted throughout the EU.
- Any form of land use that leads to humus depletion must be avoided, not only in order to protect the climate. This applies above all to agriculture on organic soils. Drainage, breaking up and use irreversibly destroys these soils, and at the

same time releases up to 40 t CO_2 per hectare per year. Positive effects of a SOC stock increase on nutrient and water storage, soil erosion, biodiversity and food security are crucial for climate change adaptation.

- Soil acidity is also an important threat for agricultural soils as well as for forest soils and should be diminished. In a long-term soil acidification raises different soil problems and reduces several soil functions. The neutralisation of acidic soils has a direct beneficial effect on physical, chemical, and biological soil characteristics. Soil biodiversity will be protected.
- In recent years, soil compaction has been considered as one of the most destructive environmental issues, affecting soil water dynamics, erosion, soil nitrogen and carbon cycling, cultivation energy requirement and effectiveness, pesticide leaching, and crop growth. We can say that high mechanical load, less crop diversification, intensive grazing, low organic matter and tillage at high moisture contents can lead to soil compaction. The new soil protection strategy should provide a political framework to implement this issue into national law.
- In numerous countries no legal binding levels for soil contaminants are defined. The EU soil strategy should demand the presence of critical values for soil contaminants reflecting the current state of science and demand a framework for protective measures in each country.

Soils are nonrenewable. Therefore the land consumption must be drastically reduced, including land take in agriculture. Moreover, we need a clear differentiation between land take and land sealing.