

ESPP input to EU public consultation on the Soil Strategy Roadmap

8th December 2020

The European Sustainable Phosphorus Platform (ESPP) promotes the implementation of sustainable phosphorus management in Europe, in particular phosphorus recycling. ESPP is a non-profit organisation, funded by its members bringing together companies, knowledge institutes and public organisations, in sectors including chemicals, fertilisers, water and waste management and recycling technologies. ESPP acts through stakeholder and inter-sectoral industry dialogue, networking, information dissemination and elaboration of joint proposals to policy makers.

ESPP (European Sustainable Phosphorus Platform) **welcomes the proposal to develop a new EU Soil Strategy, because of the importance of soil to food production, climate and biodiversity**, and because of the need for comprehensive and coherent EU policy to protect land and soil.

Phosphorus, and other plant nutrients, are critical to soil quality and fertility. At the same time, soil quality (biological, physical and chemical aspects) is critical to nutrient function in soils, and so to limiting nutrient losses and ensuring soil fertility for food production.

ESPP supports the Roadmap objectives of healthy and sustainable food systems. This must include ensuring a **fair income for farmers**, including rewarding farmers who ensure stewardship of land and soil. The CAP is probably the EU policy with the most impact on soil quality. Better monitoring of nutrient flows and stocks is essential to improving soil fertility whilst reducing nutrient losses (Farm-to-Fork objective to reduce nutrient losses by 50% by 2030) and the proposed **CAP FaST tool** is strategic for achieving this.

We support the emphasis on increasing **soil organic carbon** proposed in the Roadmap, both for climate objectives, and because soil organic matter is important for nutrient stewardship, soil fertility and crop resilience to weather conditions. The return to soil of organic carbon in secondary materials (manure, digestate, sewage biosolids, other organic wastes and by-products) should be supported, where recycling at a higher level in the waste hierarchy is not possible, whilst ensuring safety.

Problematic **contaminants in organic wastes should be addressed at source** where feasible, in particular by restriction of industrial chemicals found as contaminants in sewage biosolids (e.g. PFAS, persistent plastic additives ...) and by strong limitation of veterinary pharmaceuticals in livestock management (and so in manure).

The objectives of **nutrient and organic carbon recycling to soil**, with safety guarantees, should be embedded into EU water policy (EU Water Framework Directive, Urban Waste Water Treatment Directive, Nitrates Directive).

EU regulation should actively facilitate nutrient and organic carbon recycling in products with recognised quality, safety and agronomic performance. This is already positively engaged for some organic materials in the new EU Fertilising Products Regulation, and this work should be extended. However, ESPP regrets the absence of progress on Animal By-Products in this context. Dialogue should also be engaged on wider use of recycled nutrient and organic carbon materials in Organic Agriculture, in coherence with the different principles of Organic Farming.

Manure, digestates, sewage sludge and fertilisers should be recognised as major sources of organic carbon and nutrients to soil, and not only as sources of “diffuse soil contamination”, as currently worded in the Roadmap.