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Estonian Chamber of Agriculture and Commerce



Joint Statement on the legislative proposal for a Soil Monitoring and Resilience Directive

Soil protection is in the best interests of farmers and foresters

The quality of soil, its fertility and protection are essential and a matter of course for farmers and foresters. Protecting the most important production factor in agriculture and forestry and maintaining soil fertility is in the best interests of farmers and landowners, as soil quality has a direct impact on yields and incomes. Inherently, many techniques for carefully managing soil and maintaining and improving its condition and fertility exist. These include crop rotation, cultivation of catch crops, the use of soil-conserving tillage methods and modern techniques, efficient fertilization and the promotion of humus formation.

European regulation of soil protection is sufficient

At European level, a large number of directives, laws and regulations already directly or indirectly regulate soil protection. The Common Agricultural Policy (CAP), technical and environmental legislation have already led to improved soil conditions. In line with the principle of subsidiarity in soil protection, there is no need for additional European requirements to regulate our soils.

The proposal contradicts the EU's simplification and competitiveness objectives

There are several fundamental problems with the Soil Monitoring and Resilience Directive proposal. These include the obligation to classify every soil in Europe using broadly defined so-called soil districts, benchmarks of good soil status, and unsuitable indicators. Furthermore, the bureaucratic definition of soil districts cannot do justice to the small-scale heterogeneity of soils. This would result in extensive management requirements despite that the monitoring is based on inaccurate soil assessments and non-justiciable targets. On top of this, the law does not take various trade-offs with other EU legislation into account. The legal interference in farm operations risks endangering good agricultural practices altogether. Acknowledging that progress has been made in co-decision, the foundational problems for and short to medium term negative impact on farmers remain. Moreover, considering the EU's objectives to boost simplification and competitiveness and in view of the political principles of the Vision for Agriculture and Food to prioritise voluntariness over obligations, financial incentives over regulatory law and implementation of existing regulations over the imposition of new legislation, the Soil Monitoring and Resilience Directive would undermine and contradict the EU's political objectives.

Suspend negotiations and use existing legal framework for implementation

The proposal will lead to detailed management requirements in the short to medium term. The Commission's proposal represents a drastic intervention in agricultural and forestry practices and farm operations that disregards professional practice and will lead to extensive bureaucracy for farmers and foresters. Representing farmers and foresters from Austria, Belgium, Estonia, France, Germany, the Netherlands, Poland, Portugal, Spain, and Sweden, we reject the introduction of the Soil Monitoring and Resilience Directive and support focusing on the existing regulations and initiatives and voluntary measures in the CAP.