

IFOAM Organics Europe contribution to the public consultation on the Soil Health Law

IFOAM Organics Europe, the European umbrella organisation for organic food and farming, welcomes the European Commission's initiative to develop a soil health law to make sustainable use of soils the norm. Soil health is a corner stone of organic farming and common organic farming practices improve actively soil quality. Healthy soils are fundamental to produce nutritious and sustainable food and deliver a wide range of ecosystem services such as water purification and carbon sequestration. Farmland soils must be kept in good state or restored to be able to fulfil their function of producing healthy food, but intensive agriculture is one of the main drivers for soil deterioration. Legally binding action and a holistic approach is therefore needed at EU level to restore and protect soils.

IFOAM Organics Europe would like to take the opportunity to highlight points we consider important for the upcoming soil health law:

- **Recognize organic farming as a sustainable use of agricultural soils**

The principles of 'Health, Ecology, Fairness and Care' are what underpins organic agriculture. Transitioning to organic agriculture can contribute to restoring and protecting agricultural soils by strengthening soil carbon sinks, increasing biodiversity and avoiding undesired effects by prohibiting the use of synthetic pesticides and fertilisers. Organic production rules and common organic farming practices that are beneficial for soil health include the use of organic fertilizer like composted animal manure and crop residues, improved crop varieties, crop rotations including legumes, reduced tillage, planting of cover crops and maximizing the duration of soil cover.

Organically managed soils show significantly higher soil carbon sequestration rates and soil organic carbon stocks compared to conventionally managed soils and hence contribute to soil protection and climate change mitigation. Soils on organic farms tend to have higher soil porosity and aggregate stability and an increased water retention capacity. Improved water infiltration and retention capacity make soils under organic management more resilient against extreme weather events such as droughts and flooding, decrease the risk of soil erosion and overall contribute to climate change adaptation. Ammonia emissions, resulting from fertiliser use and livestock, cause the acidification of soils. Organic farms have lower ammonia emissions by having a lower stocking density of animals and reduced fertiliser use. Organic farms have on average 30% more biological diversity and the increased abundance of earthworms, insects and soil microorganisms further contribute to a better soil structure and quality.

The holistic and systemic approach of organic farming and the variety of practices sustain important soil functions and deliver on environmental benefits. The multiple positive effects that organic farming has on soil health and soil functions should therefore be recognized within the legislative proposal and be recognized as sustainable soil management.

- **Incentivizing farmers in adopting more sustainable soil management practices**

Unsustainable farming and forestry practices contribute largely to habitat loss, pollution, and land degradation. A shift towards more sustainable agriculture should be encouraged and supported. Organic farming, agroforestry and other agroecological approaches enable crop production and wildlife conservation on the same land. These approaches have proven efficient for the restoration of degraded land and soil-associated ecosystem functions and should be incentivized. Training and advice also have a major role to play, and farm advisory services (FAS) must be strengthened in this regard. Member States must put emphasis on sustainable soil management in their AKIS (Agricultural Knowledge and Innovation Systems) Strategic Plans as part of their CAP Strategic Plans. Existing organic farmers, new entrants, as well as conventional farmers willing to convert to organic agriculture should be supported and be rewarded for the public goods they provide.

- **Contribution to Farm to Fork - targets**

The European Green Deal and the Farm to Fork strategy include several soil related targets and policy coherence is needed between the different initiatives. IFOAM Organics Europe therefore urges the Commission to ensure that the Soil Health Law delivers on the implementation of those targets, namely the reduction of synthetic fertiliser use by at least 20% and the reduction of nutrient losses by at least 50% and that it supports the objective of at least 25% of the EU's agricultural land under organic farming by 2030. Organic farming prohibits the use of synthetic fertilizers and organic farmers improve soil organic matter and consequently build soil fertility and reduce nutrient losses by a variety of practices such as crop rotations incorporating grass legume leys (e.g. clover, alfalfa, beans and peas), intercropping and increased crop diversity. The use of farmyard manure or compost improves soil organic matter and releases nitrogen and other nutrients more gradually than synthetic fertiliser.

- **Holistic approach to define healthy soils**

The full range of soil functions and features must be analysed and taken into consideration. The importance of agricultural soils ranges from production of food and feed to habitat provision, regulating water cycles, supporting ecosystem functions and climate mitigation and adaptation. Surface sealing has to be strictly limited to protect fertile soils and valuable farmland. The Horizon Europe mission "A Soil Deal for Europe" lists out 8 specific objectives covering a variety of aspects for soil protection and restoration and they should be taken forward by the Soil Health Law as well.