

Response to the European Commission's Open Consultation on The Soil Thematic Strategy
Healthy Soil for a Healthy Life

Quote: When we fill urban landscapes with introduced plants, we are severing crucial, dependent relationships between native plants and wildlife that have evolved over millennia. These partnerships and interdependencies support all life on earth, including us. We need to plant native plants, and we need to plant them in natural communities — woodland gardens, meadows, prairies, rain gardens. By writer Lorraine Johnson and conservation biologist Sheila Colla, Canada.

Municipal Waste Europe (MWE) welcomes the Roadmap for a new Soil Thematic Strategy and the coordination between the Waste and Land Units of DG ENV and calls on the European Commission to strengthen its policy by:

- 1) Coordinating with the Waste Unit, DG ENV on the management of biowaste and the consistent return of anaerobically digested and aerobically composted biowaste to soil
- 2) Formally recognising the numerous benefits of the application of digestate and compost from biowaste for soil and plants including nutrient delivery and carbon sequestration
- 3) Formally recognising the direct links between a soil rich in organic matter, the planting of native plant species, the health of the local pollinator population, flood abatement, water security, the productivity of farming and the stability of the local microclimate including the small water cycle
- 4) Formally recognising the harmful effects of peat extraction, both to the biodiversity of the peat marshes and in emissions of methane
- 5) Setting targets for the replacement of peat by digestate and compost from biowaste in all of its applications within the EU by latest 2030.

Regenerative land-use and farming practices which include no tilling, as this releases soil organic carbon into the atmosphere as CO₂, and the application of fresh mass compost from biowaste, increases soil carbon content by 30kg* for every ton of compost applied. These soil management practices are a key factor in achieving the European Green Deal's goals of climate neutrality, biodiversity restoration, land degradation neutrality, sustainable food systems and a resilient environment. Digestate can either be a nutrient rich addition to a woody compost with the above-mentioned benefits or be applied directly to the soil in accordance with geology and crop, providing a rich, natural source of Nitrogen, Phosphorus and Potassium.

Today the use of peat in large and small-scale horticulture is common practice throughout Europe. Peat extraction causes the ecological equilibrium of peat marshes to be unbalanced resulting in drying, high emissions of methane and wildfires releasing more CO₂. MWE calls on the Commission to set targets for the replacement of peat by compost from biowaste in all of its applications within the EU by latest 2030.

For the reasons given above, MWE calls on the Commission to address the transformation of soil depleting farming practices into soil biodiversity building practices in the Soil Thematic Strategy. MWE proposes the use of EU funds for support of this transformation, communication and education along the entire food chain to achieve this goal and would support the use of targets.

As waste management practices are the source of digestate and compost from biowaste, the Soil Thematic Strategy should formally recognise the value of separate collection of food waste and garden waste and encourage this as part of the Strategy. It is also a legal obligation of the 2018 Waste Framework Directive to collect biowaste separately or treat it at source by latest 1 Dec 2023. Following the separate collection of food and garden waste, the appropriate investments need to be in place to process collected quantities into digestate and compost. In many cases the most effective treatment method is to anaerobically digest the food waste first and either use the digestate directly or co-compost it with shredded garden waste to produce a high quality, nutrient rich compost. Investment is therefore needed to close the gap in treatment capacity for anaerobic digestion and composting. Coordination between the Soil Strategy and the application of EU funds to encourage investment in the requisite local capacities for anaerobic digestion and composting is necessary.

27 April 2020

Compost and digestate are needed in agriculture, horticulture, urban greening and soil remediation both for impervious clay soils and to combat desertification. Today, 12.7% of European soil is affected by moderate to high erosion causing an estimated loss of agricultural produce equal to €1.25 billion per year. Around 411,000 kilometres squared; 25% of soils in South, Central and Eastern Europe; are in danger of becoming deserts by 2050. The European Environment agency also recognised this in its 2020 state of the environment report stating that without binding targets, incentives and measures to protect land, soils and biodiversity, the EU would be risking its ability to achieve future objectives laid out in the Circular Economy Action Plans and the European Green Deal.

European cities and towns also need to support efforts to create a biodiverse habitat using compost and digestate from biowaste to remediate their soil and planting native plants including groundcover, shrubs and trees as they prevent evaporation. These practices, together with the regular application of compost encourage and maintain soil biodiversity and increase carbon storage with each application. Organic matter from compost contains microorganisms which transform soil minerals into a bioavailable form for easy absorption by plants and the organic matter stores water in the soil, so reducing watering need and reducing or preventing flooding during heavy rain events. These effects of compost and digestate application and ensuing soil health are integral to the support of pollinators, the creation of a circular bioeconomy and food security.

Thanking you in advance for your consideration of the points we raise in the further development of the Soil Strategy,

Vanya Veras
Secretary General

Rue d'Arlon 63, B-1040, Brussels - Tel: +32 2 400 10 94

Web: www.municipalwasteurope.eu

*In net CO2 equivalent savings this is 143kg per ton of fresh mass compost applied to one hectare of soil