

## Northern Sparsely Populated Areas' (NSPA) views on the European Commission's proposal for Soil Monitoring and Resilience Directive

*The Northern Sparsely Populated Areas network, NSPA, represents the interests of the four northernmost regions of Sweden (Norrbotten, Västerbotten, Jämtland Härjedalen and Västernorrland), the seven eastern and northernmost of Finland (Central Ostrobothnia, Kainuu, Lapland, North Karelia, Northern Ostrobothnia, Pohjois-Savo and South Savo), as well as the two northernmost regions of Norway (Nordland, Troms & Finnmark).*

### The NSPA Position

The NSPA welcomes the ambition behind the European Commission's proposal for the Soil Monitoring and Resilience Directive. Healthy soil is a key element for the resilience of the Northern hemisphere, where there is a long history of monitoring soil condition. Furthermore, healthy soil is a basis for the area's large bioeconomy including forestry, agriculture, and ecosystem services. To ensure soil health in the region and to contribute to the EU soil health targets, NSPA would like to put forward the following comments on the proposal:

- The proposal should be withdrawn and re-worked. NSPA cannot see that the costs correspond to the expected benefits. The Northern sparsely populated area has fewer citizens per square kilometer than anywhere else in the EU. To implement a new regulation could mean higher costs for regions with large areas and few inhabitants. Therefore, NSPA calls for paying attention to avoid overlapping monitoring that could increase reporting burden and costs for the forest practitioners and farmers. Improvement practices for soil health should consider the regional social and economic circumstances.
- The NSPA would like to highlight the extensive soil monitoring practices that are within the scope of national competence. National monitoring practices that are based on scientific evidence have been used for a long period of time to maintain good soil condition. NSPA supports the common goal for improving soil health on the EU level, but the methods and practices must be based on the local assessments. Therefore, NSPA calls for flexibility in implementation of any objectives and respect for the principle of subsidiarity and proportionality.
- The NSPA questions whether it is reasonable to use the same model for monitoring such different land types as agriculture, forestry and contaminated sites in such a geographically vast and diverse area as the EU. The European Commission should take into consideration that the measures and actions for improving soil health should be based on the place specific soil characteristics. Furthermore, NSPA sees that there is no single definition for a healthy soil, rather the definition is based on the local environmental conditions.
- The indicators for soil health should also be based on the place-based soil assessment. For example, soil of the Arctic tundra biome, requires specific indicators to understand the

practices to maintain soil health. Locally sourced indicators also ensure that monitoring is directed to indicate the main threats for soil health and that resources can be prioritized for prevention.

- The proposed soil health monitoring by use of satellites should be reconsidered both from effectiveness and privacy point of view. The data collected by satellites may not provide information of the specific conditions of the soil area that is needed to set out the practice to improve the condition. Therefore, data that is collected on land should be prioritized and supported to receive the most accurate information on the soil condition. Satellite surveillance also includes the risk for miss use of collected data. Therefore, with increasing use of new technologies, issues around privacy need to be considered.