

Natural Scotland - State of Soil report.

**Comments to be returned to SEPA - Karen Dobbie (karen.dobbie@sepa.org.uk) by
23 December 2010**

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General Comments

LINK welcomes this report. It helpfully sets out the condition of Scotland's soils and will help to provide a strategic direction to policymaking on soils, and for improving the ability of soils to function in Scotland.

We welcome the style of the document in that the chapters in the body of the report follow the theme of pressures on soil, and are akin to the pressures listed in the proposed EU Soil Framework Directive. We feel that this gets to the heart of the issues facing soil rather than focusing on land uses or functions, which is sometimes the format for reports of this type.

We welcome the level of detail in the report, specifically in chapters 3-9, although we not able to provide detailed feedback at this time.

The scoring process used in the document, to rate the impact of the pressures on soil functions, is good and helpful to understanding the relative impacts and state of the different functions of soil. This will be useful to policymakers.

Specific Comments

Chapter No.	Page No.		Comment
5	32	Line 27	Contamination – We welcome the statement that nutrients applied in excess can be harmful and the discussion of the environmental impact of nutrient deposition in section 5.3. However, the report does not discuss the issue of eutrophication of farm soils through the use of fertilizers, organic and inorganic. This intensive application of nutrients has historically changed the balance and quality of soils to benefit crop growth, whilst making farmland habitats less suitable for biodiversity .
11	99		We agree with the need to step-up monitoring of soils (Chapter 11) and the pressures on soils in a systematic and strategic way.
11	101	Line 1	LINK agrees that there is a need to understand more about soils through research, specifically research into soil biodiversity. The document should be clear that the 'Key issues for soils' (page 101, line 1) is not an exhaustive list and needs to be developed into a prioritized research programme with the support of Stakeholders
11	101 - 104		Policies – Section 11.2 covers policy requirements for soils. The value of this document is in its comprehensive discussion of the facts and science regarding the state of soil. The policy requirements section (11.2.2) then aims to look forward to policies and recommendations which could improve the state of soils in Scotland. Whilst this list of policies is welcomed we do not feel that this document is the place for a discussion of soil policy options. Therefore, we recommend that the recommendations are removed from section 11.2. Instead, this section should retain the listed policies which can influence soil and the factual discussion of these, and policy options be included in section 11.3. We welcome the statement on page 104, line 41 that this is not an exhaustive list but serves as an illustration.
11	101	Line 32-33	LINK agrees that multiple benefits must be the aim of land management planning but we believe that achieving no pollution swapping is not a realistic objective. Instead we recommend that the words '...ensure that pollution swapping is minimised..'
Annex 3	140		List of species – we would like to see this list become a comprehensive list of species. At present it fails to include complete groups of species, such as Annelids, E.g. Lumbricus terrestris – Common earthworm.
Annex 3	140		We would like to see the following included: Bird – Riparia ripara – sand martin – nests in burrows in sandy cliffs