Comment on the CREDIBLE consultation …FG1.2

FG1.2 Assessing the economic impact of the co-benefits of increasing SOM with carbon farming - link

Comments. The evaluation of the economic benefit of SOM is too negative. Better not to refer to the "Soil Health Directive" - it is actually the Directive on Soil Monitoring and Resilience. It is difficult to talk about a "cobenefit" for SOM ..actually there are 6 potential cobenefits in the EU Sustainable Finance initiative .. SOM is not one of them - but is directly costed in the price carbon certificates. It is not a co-benefit. Please spell "ton" as "tonne" - we are in the EU. N2O reductions are not "cobenefits" - they are mainstream GHG benefits and can be quantified. The recommendations are fine but I would have expected more background, for example quoting the following.

1. **European Commission's Impact Assessment Report** accompanying the Proposal for a Directive on Soil Monitoring and Resilience (SWD(2023) 417 final). Arguably the most influential document. It provides a comprehensive cost-benefit analysis of soil degradation and the benefits of sustainable soil management at a pan-European level, and synthesizes a vast amount of existing research: e.g. quantifying the economic losses from soil degradation at estimated at €50 billion per year, and the potential benefits of restoring soil health exceeding costs by 1.7.
2. **Panagos, P., et al. (various papers from the Joint Research Centre - JRC)**. This team have been instrumental in mapping and quantifying soil degradation processes across Europe, particularly soil erosion. Their numerous publications provide fundamental data on the physical extent and severity of degradation, which then underpins economic valuation studies. Specific papers would include those focusing on the economic costs of soil erosion, nutrient loss, and the impact of land use changes.
3. **The BENCHMARKS project outputs are diverse.** The core idea of establishing a harmonized and cost-effective monitoring framework for soil health across Europe is critical. The economic value of such a framework lies in enabling better decision-making, targeted investments, and the ability to track the economic returns of soil health interventions. Look for key publications emerging from this project that define the indicators and methodologies.
4. **The InBestSoil project gives a monetary valuation of soil ecosystem services** and creation of initiatives to invest in soil health. It specifically focused on developing an economic valuation system for ecosystem services provided by healthy soils and exploring their incorporation into business models and incentives. Academic outputs from this project help our understanding of how to monetize and incentivize soil health improvements at various scales.
5. **Various papers on the "natural capital" approach to soil valuation in Europe** - e.g. from JRC or EEA have applied the "natural capital" accounting framework to soil. This approach integrates the value of natural assets, including soil, into economic decision-making and provides methodologies and case studies for valuing soil's contribution to various ecosystem services.