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The COMMON FORUM on Contaminated Land, initiated in 1994, is a network of contaminated land policy makers, regulators and technical advisors from Environment Authorities in European Union member states and European Free Trade Association countries (<http://www.commonforum.eu/>).

The Common Forum welcomes the Commission's willingness to review the need for a Soil Framework Directive ([http://ec.europa.eu/commission\\_2010-2014/president/news/archives/2013/10/pdf/20131002-refit-annex\\_en.pdf](http://ec.europa.eu/commission_2010-2014/president/news/archives/2013/10/pdf/20131002-refit-annex_en.pdf)).

We would be very willing to engage with the Commission in our mutual interest in ensuring Europe manages its soil well. We note and welcome the Commission remaining committed to achieving the objectives of the proposed SFD. We would remind the Commission that we have worked collaboratively to develop an alternative framework wording on dealing with contaminated sites using proportionate and focused actions. This text is available at <http://www.commonforum.eu/SoilDirectiveAlternative.asp>.

It should be considered whether the objectives of the proposed Directive could be achieved by a modified directive, leaving more flexibility to the member states, by integrating the objectives into other directives, or by a strengthened strategy with improved knowledge exchange within a Europe of regions and without specific legislation. The COMMON FORUM is – as always – ready to be addressed for discussion.

We would also wish to reassure the Commission that despite the SFD not being adopted, considerable 'effective action' in, for example, managing contaminated sites, has taken place throughout Europe over the last decade, as well as the implementation of the other pillars of the EC Soil Protection Strategy (e.g. by increasing public awareness or integration of soil protection into other EC policies – Environment Liability or Industrial Emissions Directive). Considerable efforts have been made to share good practice amongst member states and regions. We have seen a remarkable convergence on practice in the identification of contaminated sites, the use of risk assessment to decide on the need for intervention, the design of integrated strategies with regard to land management also protective for water resources and the use of innovative remediation technologies to render sites safe for humans and ecosystems (including water resources).

Also the other soil threats such as soil sealing, loss of soil organic matter and soil erosion as mentioned in the Soil Thematic Strategy, are already under consideration and solutions are sought in pilot projects, in addition to being tackled through other existing legislation and voluntary approaches. These threats can also be considered as challenges when they are valued with regards to ecosystem services of the soil-sediment-water system.