



19 March 2021

Dear Dr. Holzleitner,

We would like to thank you for your remarkable contribution when seeking climate solutions on land use. The carbon farming roundtables 2019-2020, your commentary speech on MTK-SLC climate roadmap -webinar last October, and the latest event on 25 February 2021 indicate your willingness to co-operate with farmers, which we highly appreciate.

In your concluding remarks, on the workshop 25 February 2021 "The role of agriculture and land-use sectors in a climate-neutral EU in 2050", you called for a common vision on "what do we want our land in 2050, for food production, biodiversity, and carbon storage". In our view, we can reach all these targets but only by careful co-operation with farmers and forest owners and relevant on-farm solutions, which respect local pedo-climatical conditions and scientific evidence of the best management practices.

MTK-SLC Soil program is under preparation to safeguard healthy soils and their respect. In Finland, we have developed sustainable forest management for decades, as well as environmentally friendly farming practices. Our farmer-driven MTK-SLC Soil Program, to be published 25 May 2021, reflects EU's soil strategy and zero-emission targets in Finland as well as link [MTK's Climate program](#) (2018), [MTK's Biodiversity program](#) (2020), [MTK-SLC Water program](#) (2020) and [MTK-SLC Climate roadmap](#) (2020) in respect of land ownership in a changing climate.

You asked on February 25, "what is the overall contribution of agriculture and forestry, as the same plot of land is for emission and removals". Exactly, the sustainable land use for food and forestry is a part of the solution, not the threat and not because of lack of legal framework as described in [the European Parliament resolution on Soil protection](#).

Carbon farming, if seen also as a tool to increase soil health and productivity including management of organic soils, offers many possibilities on our way towards the climate-neutral future. However, there are also many concerns. The most serious one is the data gap on soil management effects (e.g. minimum-tillage of cover crops or crop rotation by deep-rooting grass species) on greenhouse gas emissions and removals. Especially on organic soils, we are lacking not only clear definition (e.g. carbon content and depth of organic soil horizons) but reliable data to estimate climate effects.

We wish you consider our thoughts. We keep in our minds your message from 2019: Before the legislation, we need better soil data. Especially also when you are updating the LULUCF legislation. Please find attached our position on how to design LULUCF and ESR policies.

Sincerely,

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