

## Soil management carried out by the Belgian Department of Defence

**Military activities contain important risks for the environment. The Court checked whether the Department of Defence had an effective policy of prevention and cleaning-up of soil pollution. It appeared from the audit that especially these last few years, the Department had taken action with regard to the environment and, in particular, soil management. It, however, had little insight into the levels of accumulated (historical) pollution and the exact nature and scope of the polluting activities; besides, it had a pragmatic more than a planned approach when it had to deal with soil pollution. Furthermore, it earmarked only few financial resources for the cleaning-up of polluted land. After receiving the report, the Defence Minister answered that the development of the environmental policy and soil management would build on the Court's recommendations.**

Military activities contain important risks for the environment. In the wake of the growing interest for environmental issues, the military authorities of NATO countries have taken initiatives in order to prevent pollution as much as possible and to clean up or keep within bounds the level of accumulated and new pollution. As decontaminating polluted soils can prove very expensive, good prevention measures are of utmost importance.

The Court checked whether the prevention measures taken by the Department of Defence and the approach to soil pollution were proving effective and whether subordinate arrangements for an effective soil management were in place.

On the basis of the audit, it appeared that several arrangements for an effective soil management were not yet fulfilled and that the Department's approach to pollution prevention and soil decontamination was more pragmatic than planned. Between 1995 and 2004, the cost of soil cleaning amounted to 3.5 million euros. The Department estimated the cost of ongoing dossiers at some 12 million euros. In comparison with other countries, this amount was particularly low. To take the example of the Netherlands, for instance, the military soil decontamination programme (1991-2010) was costed at 225 million euros. Besides, it needs to be said that the cleanup costs connected with the sale of Belgian military soils and quarters were often deducted from the selling price, so that the real cost of soil decontamination was unclear.

The Court mentioned the following issues as hampering an effective soil management.

The legal framework for soil management lacked transparency, because of an unclear link between military and environmental legislation. The enlarged application scope of the two-hundred year-old military legislation limits the implementation of civil legislation. Such exception rules in favour of military activities no longer enjoy much support at the international level.

There was little planning for an environment and soil management in spite of an environmental policy brief. There was no general soil policy (depicting the use and the classification of military soils), in which to incorporate soil management. The objectives as regards prevention and decontamination were not verifiable and there was no assessment of the policy brief's budgetary impact. The Department should, at the very least, gain a more accurate insight into the poor environmental track record and the activities which are harmful to the environment, in order to act with a full knowledge of facts in its approach to pollution prevention and cleanup.

These last few years, the Department has gained awareness of the environmental issue. It adapted its organizational structure to take account of the environmental care factor in a global and integrated way. Many internal instructions also showed that the Department was aware of the legal framework regarding existing environmental management and techniques. However, the tools necessary to make this work (procedures, computer programmes,) were not yet in place or were not yet operational. Too little attention was paid to the implementation of the instructions, the follow-up and the internal control.

The Department of Defence had a pragmatic approach to soil pollution but was facing a serious lack of resources. Few decontamination dossiers were so far opened or closed. In addition to an analysis of environmental risks, priorities were also defined on the grounds of operational and budgetary considerations when it came to decide which soil analysis and decontamination should come first. The Department lacked any formal programme pinpointing the cost and the duration of an entire cleanup operation. In any event, the decontamination of polluted soils will, sooner or later, require considerable financial resources.

The Defence Minister answered that on the whole the report's conclusions gave a correct account of the department's environmental policy and soil management and that the development of the environmental policy and soil management would build on the Court's recommendations.