

Commissioner Phil Hogan  
Commissioner for Agriculture  
European Commission  
B-1049 Brussels, Belgium

13 May 2016

Dear Commissioner Hogan,

Cc Commissioners Vella and Cañete

**Subject: Upcoming exchange of views in the Agriculture Council on climate and agriculture (May 17) with particular reference to the forthcoming Effort Sharing Decision and LULUCF proposals**

Agriculture currently represents approximately 10% of total EU greenhouse gas emissions (GHG).<sup>1</sup> Moreover, the Commission foresees that non-CO<sub>2</sub> emissions from agriculture will represent one third of total EU GHG emissions by 2050. Therefore, the agriculture sector should be required to contribute to emissions reductions to meet the more ambitious climate targets set out in the Paris Agreement.

It is often repeated that agriculture has a lower mitigation potential than other sectors, but there are numerous practices that could reduce emissions in the agricultural sector. Many of these also increase biodiversity, environmental protection and animal welfare while benefiting farmers and the economy. Several practices are already in place that offer a holistic approach to the problem and help ensure a sustainable future for farmers (see footnote 2).<sup>2</sup> Consistent with the Paris Agreement the Commission should prioritise and promote these practices, notably through the use of public funds, including under the Common Agricultural Policy (CAP). This is currently not the case<sup>3</sup>.

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<sup>1</sup> <http://www.consilium.europa.eu/en/meetings/agrifish/2015/10/22-23/>

<sup>2</sup> The following presents a non-exhaustive list of practices to reduce greenhouse gas emissions from land use, land use change and forestry. Note that these practices need to be embedded in a wider sustainable farming system to be able to deliver. None is a panacea in itself and some can even be counter-productive when not applied as part of a wider ecological farming model: *i) land use change*: peatland restoration, managed realignment of the coast, grassland creation and conservation; *ii) strategies in arable farming*: crop rotation, catch and cover crops, improved crop varieties, nutrient management, reduced or no till; *iii) strategies in livestock farming*: manure management, animal health improvements; and *iv) managing demand and reducing waste*: sustainable diets, food waste reductions.

<sup>3</sup> <http://www.eeb.org/index.cfm/news-events/news/new-research-shows-cap-greening-will-fail-to-make-positive-impact-on-europe-s-farms/> and <http://www.birdlife.org/europe-and-central-asia/policy/event-hidden-truth-resources>

We are concerned that climate-related policies could be used to mask plans to further intensify agriculture. We object to the proposed use of carbon credits from land and forest to offset emissions from agriculture. This would distract from the urgently needed move towards a more sustainable food and farming model. We call on you to ensure that land use, land use change and forestry (LULUCF) do not weaken the Effort Sharing Decision, which addresses the majority of emissions from agriculture.

### **Detrimental impact of our industrial farming model on the environment**

Intensive farming harms our climate, our air, water and soil, and is the main driver of biodiversity loss. The agricultural sector is the primary source of diffuse pollution in the EU, affecting 90% of river basin districts, 50% of surface water bodies and 33% of groundwater bodies. Member States have acknowledged that agriculture is the main threat to nature in the context of a continued loss of flora and fauna on farmland.<sup>4</sup>

### **Export-oriented industrial agriculture model harms global food security**

The strong push in the EU to further intensify livestock production for export, in light of a slowing EU demand,<sup>5</sup> is contributing to undermining food security in other countries, as small-scale farmers, who provide food for up to 80% of the world's population<sup>6</sup>, are pushed out of business.

### **Push for forestry offsets is undermining environmental integrity**

Some Member States, such as Denmark and Ireland,<sup>7</sup> have recently asked to be allowed to offset agricultural GHG emissions with credits resulting from the removal of CO<sub>2</sub> by land and forests.

The Commission should reject these requests. Such an approach would promote an industrial forestry model, since afforestation is often done through plantations of fast-growing alien species, which, in turn, is likely to lead to a loss of marginal farmland vital for biodiversity.<sup>8</sup>

LULUCF rules must be significantly improved to adjust flawed calculations. We urge the Commission to ensure the use of realistic calculations of the effective potential of EU forests to act as a sink. We are concerned that the current emphasis on offsetting agriculture emissions through LULUCF undermines the required improvements of the LULUCF rules.

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<sup>4</sup> <http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52015DC0219&from=EN>

<sup>5</sup> [http://ec.europa.eu/agriculture/events/2015/outlook-conference/17-van-doorslaer\\_en.pdf](http://ec.europa.eu/agriculture/events/2015/outlook-conference/17-van-doorslaer_en.pdf)

<sup>6</sup> <http://www.fao.org/docrep/019/mj760e/mj760e.pdf>; <https://www.grain.org/article/entries/4929-hungry-for-land-small-farmers-feed-the-world-with-less-than-a-quarter-of-all-farmland>

<sup>7</sup> <http://data.consilium.europa.eu/doc/document/ST-7362-2016-INIT/en/pdf>

<sup>8</sup> Many red-listed species – i.e. species in danger of extinction – are dependent on farmland habitats. These are habitats that are most likely to be the target of afforestation projects if it is further incentivised, which is likely to harm biodiversity. In Ireland for example, since 1990, around 300,000ha of plantations have been established, mainly on marginal and elevated sites. 60% of this is made up by four non-native species. This has had a particularly bad impact on hen harriers, which rely on open moorland. 52% of the Hen Harrier Special Protect Area Network is now covered in forestry, contributing to a population collapse, with levels down by 28% since 2005

## Do not let agriculture off the hook through offsets

The crisis in the pig farming sector demonstrates the economic consequences of unsustainable farming: the promotion of capital-intensive, export-oriented farming systems that depend on international markets ultimately ends in a race to the bottom in terms of environmental and social standards, destroying farming livelihoods in Europe and the global South.

Instead of supporting intensive meat production, the EU should ensure that meat is produced sustainably and that quality is prioritized over quantity which is also more profitable for farmers.

**We therefore ask you to ensure that the agriculture sector will not be exempted from efforts to reduce emissions and that the forestry sector will not be used as an offset for agriculture emissions. This is essential to avoid a conflict with the EU's international climate commitments and the economic and environmental sustainability of the farming sector. A sustainable food and farming system will help reduce emissions, boost climate change resilience, improve biodiversity and benefit farms economically.**

Yours sincerely,

Jeremy Wates,  
EEB Secretary General



On behalf of

Act Alliance,  
BirdLife Europe,  
Greenpeace,  
IFOAM EU Group,  
Slow Food