Voting recommendations

LULUCF/Arsenis report, 10 October 2012

International Federation of Organic Agriculture Movements EU Regional Group

IFOAM EU Group voting recommendations

on the report on accounting rules and action plans on greenhouse gas (GHG) emissions and removals resulting from activities related to Land Use, Land Use Changes and Forestry (LULUCF)


BACKGROUND

After consultation with Member states and stakeholders as well as an assessment of different policy options, the European Commission (COM) published in March 2012 a Proposal for a Decision on the accounting rules and action plans on greenhouse gas emissions (GHG) and removals resulting from activities related to Land Use, Land Use Changes and Forestry (LULUCF) sector. This proposal provides not only an alignment with the outcome of the international negotiations for the United Nations Framework Convention on Climate Change (UNFCCC) in Durban in December 2011 that makes GHG accounting from forest management, afforestation, reforestation and deforestation mandatory. It is moreover an opportunity to strengthen EU’s position as a forerunner in climate change policy by obliging member states to account for GHG emissions and removals from cropland and grazing land for all EU.

The legislative proposal aims to establish a harmonised legal framework for GHG accounting across the Member states with which the LULUCF would be formally included to the EU’s target to reduce GHG emissions by 20% by 2020. The proposal is now subject of a co-decision procedure in the Council and the EU Parliament.

ACCOUNTING RULES

IFOAM EU Group welcomes that the Commission proposal on LULUCF aims to make GHG accounting on cropland and grazing land mandatory, as this increases the transparency of GHG emissions from land management. We also welcome the fact that through accounting the negative climate impacts due to land use changes (e.g. for energy crop production), would become more visible. The European Parliament draftsman Kriton Arsenis suggests to also make accounting for GHG emissions and removals from wetland drainage and rewetting mandatory. IFOAM EU group supports this suggestion as wetlands are of crucial importance for the GHG balance. Member states may argue that it is hard to estimate emissions from some activities. This is true, but ambitious commitments must be made now to
help and incentivize further work on better and reliable measuring and accounting and to strengthen the role of the EU as a pioneer to move forwards in climate change mitigation.

Please **support** the following amendments:

- **amendment 2** (rapporteur), Proposal for a decision, Recital 4;
- **amendment 20** (rapporteur), Proposal for a decision Article 3 – paragraph 1 – point f a (new);
- **amendment 21** (rapporteur), Proposal for a decision, Article 3 – paragraph 1 – subparagraph 2
- **amendment 189** (Bas Eickhout).

Please **vote against**:

- **amendment 3** (AGRI Committee) and **amendments 86, 88 to 91 and amendments 93 to 95** (ENVI Committee); which aim to keep GHG accounting from cropland and grazing land management as well as from wetland drainage and rewetting voluntary.
- **amendment 87** since it foresees mandatory GHG accounting only for forestry activities;
- **amendments 92 and 96** (ENVI Committee) even if these amendments consider mandatory GHG accounting on forestry, cropland management and grazing land, they still consider on voluntary basis only wetland drainage and rewetting.
- **amendments 15 to 17** (AGRI Committee) and **amendments 165 to 188 and 190** (ENVI Committee) as they aim to keep GHG accounting from cropland management, grazing land, wetland drainage and rewetting either voluntary or out of the text.

**ACTION PLANS**

Accounting itself is only a measure to increase transparency, whereas the national action plans and policy instruments such as those within the Common Agricultural Policy, Water framework directive, etc. will have the potential to lead to GHG emission savings from the LULUCF sector. As soils play a crucial role in this concern, the proposed framework directive for the protection of soils\(^8\) - If finally adopted - could be an important tool for climate change mitigation and adaptation in agriculture.

IFOAM EU welcomes the proposal that member states will have to draw up action plans to limit or reduce GHG emissions and maintain or increase removals from the LULUCF sector. Whereas measures effectively will have to be financed under different policies, e.g. the rural development programmes, action plans would be
an appropriate step towards setting coherent frameworks for targets and measures within the different policy areas to combat climate change.

IFOAM EU Group underlines that it is of crucial importance that all measures to combat climate change within the LULUCF action plans must focus on practices that provide comprehensive approaches towards GHG reduction and overall sustainability. A pure focus on GHG emission reduction in agriculture is not appropriate, as farm systems are complex and adverse effects could on other sustainability goals (for example on biodiversity, soils, water availability, reduction of water pollution, quality food without chemical residues, animal welfare) could be the consequence. Moreover, climate change adaptation must be taken into account, as farm systems need to be made more resilient to consequences of climate change. Long term food security and the capacity of local communities to feed themselves must be the in focus, crop production for energy purposes must not put this at risk. Organic farming should be specifically highlighted in action plans and other policies to reduce GHG emissions and increase removals for its high potential to contribute to climate change adaptation and mitigation.

Please support:
- the Rapporteur’s amendments 58 to 68 on this subject;

Please vote against:
- amendments 6 and 37 (AGRI Committee) and amendments 113 to 115 and 261 to 264 (ENVI Committee) as those would weaken the proposal by deleting completely the LULUCF National Action Plans;
- amendment 275 (ENVI Committee); It deletes the guidance relating to what LULUCF National Actions Plans may contain;
- amendments 276 to 279, 282 and 283 (ENVI Committee); These amendments weaken effectiveness of LULUCF action plans;
- amendments 289 to 292 and 306 to 309 (ENVI Committee) As they delete the evaluation made by the European Commission to the Member States’ draft LULUCF Action Plans and the implementation of the final plans;

HOW ORGANIC FARMING CAN CONTRIBUTE TO TACKLE THE CLIMATE CHALLENGE

Climate change mitigation: Organic farming systems due to increased humus accumulation in soils are capable of storing on average 450 kg CO₂ per ha and year extra carbon compared to conventional systems (Gattinger, A., et.al 2012). Moreover, N₂O (nitrous oxide) emissions from organically managed soils are on average significantly lower (about 440 kg CO₂ equivalent per hectare and year) than emissions from non-organically managed soils. (Skinner, Gattinger et al.,
submitted). The advantages of organic farming can be rated even higher if carbon emission reductions beyond the farm gate are taken into account: A study commissioned by the Danish government in 2001 found that conversion to organic agriculture would result in energy savings from 9-51% (Hansen, Alrøe & Kristensen, 2001). Lower energy consumption on organic farms is generally attributed to lower concentrate feeding, lower stocking rates, the absence of synthetic fertilisers, and the lack of synthetic pesticides.

**Climate change adaptation:** Humus accumulation is also one of the most effective adaptation strategies to climate change, as soils rich in organic matter absorb more water during extreme rainfall, reduce surface run-off and erosion and persistently supply water during dry periods. Numerous studies determined an increased stability of soil aggregates and Zeiger and Fohrer (2009) showed better water infiltration in organically as compared to conventionally-managed soils during simulated rainfall experiments. Increased water holding capacity, higher water content in soil and improved infiltration rates of water have been found also by other studies.

The climate change mitigation and adaptation potential of organic farming comes in a "package with broader advantages for sustainability", e.g. in terms of biodiversity enhancement, prevention of water pollution, resource efficiency, animal welfare, avoidance of pesticide residues in food (for more data see: IFOAM EU Group 2009, 2010 and 2011). This comprehensive approach of organic farming towards climate change mitigation and sustainability stands in contrast to other measures that are promoted for climate change mitigation in farming which often have adverse effects on other sustainability goals, as for example low/zero tillage in combination with increased herbicide use.

The IFOAM EU Group calls on the Members of the European Parliament to promote a comprehensive, sustainable approach in all following policy steps regarding climate change and farming and to consider agro-ecological approaches - with organic farming as EU wide certified model- as key to meet the climate challenge in food and farming!

Further information:
(included on the page are links to climate change studies, 2009)

IFOAM EU Group, 2011: Organic farming and resource efficiency - facing up to the challenge:
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The **IFOAM EU Group** is the European working level within the International Federation of Organic Agriculture Movements. It brings together more than 300 organisations, associations and enterprises from all EU-27, EFTA and candidate countries. IFOAM´s goal is the worldwide adoption of ecologically, socially and economically sound systems that are based on the principles of Organic Agriculture.

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**Endnotes**


3 Greenhouse gas removal is a result of carbon sequestration in plants and soils.

4UNFCC, 2011: Durban agreement: http://unfccc.int/resource/docs/2011/cmp7/eng/10a01.pdf; Definitions for “natural disturbances” and “wetland drainage and rewetting” have also been established.

5 The LULUCF sector was left out of the EU’s climate commitments under the Climate and Energy Package due to the recognition of serious deficiencies in international accounting rules of emissions from this sector. The sector is reported under the UNFCCC and partially accounted under the Kyoto Protocol.


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