



**clean air farming**

Reducing Ammonia and Methane  
Emissions from Agriculture

## **Farm to Fork “F2F” Strategy Online Consultation**

**Feedback from Deutsche Umwelthilfe e.V./ Environmental Action Germany**

**Berlin / Brussels, 16<sup>th</sup> March 2020**

Deutsche Umwelthilfe e.V. (DUH/ Environmental Action Germany) welcomes the opportunity to comment on the European Commission’s Roadmap for the Farm to Fork Strategy (F2F) as well as the efforts taken with the Green Deal. A general strategy that guides the EU member states towards a transition for a sustainable food system is highly needed in times of ongoing structural change in agriculture in Germany (e.g. expressed by farmers’ protests and sadly increasing polarization) but also in other EU member states. Therefore, we strongly support the stated objective to “transition towards a sustainable food system that should have a neutral or positive environmental impact, is capable to adapt to climate change and at the same time contributes to climate change mitigation, ensures food security and creates a food environment which makes healthy diets the easy choice for EU citizens”. Nevertheless, if the European Commission aims to take this objective seriously, DUH would like to suggest the following adjustments for the F2F strategy. The position is partly based on the consultation response on the Farm to Fork Strategy Roadmap stated by the European Environmental Bureau (EEB).

In general: For the transition towards a sustainable food system, we need a holistic approach to environmental sustainability, which a) aims towards an incremental greening of agriculture by setting higher standards for conventional farming (step-by-step adjustment towards organic standards), b) addresses the whole food value chain in the same way and c) ensures that the transition does not leave anyone behind (especially vulnerable actors like small farmers, independent processors and retailers).

That includes concrete targets for e.g. pesticide and fertilizer use, nature friendly structures in the field, crop rotation etc. (see the following recommendations) but also targets for the consumption level (e.g. reduction of food waste and the consumption of meat). Furthermore, it is crucial to improve environmental compliance assurance within the agriculture, fisheries and aquaculture sectors. EU already has excellent environmental laws, which are not respected by all member states in the same way. Therefore, the European Commission must increase efforts to enforce the Birds and Habitats Directives, Nitrates Directive, Sustainable Use of Pesticides Directive (regarding IPM), Water Framework Directive, and Ambient Air Quality and National Emissions Ceilings (NEC) Directives. Finally, actors along the food value chain must be supported financially but also through regional consultation by experts to become agents of change.

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Concrete Policy recommendations for a sustainable food system are:

Set **quantitative, time-bound targets backed up by robust monitoring**, to drive policies in the right direction and at the right pace:

- Reducing CO<sub>2</sub> and non-CO<sub>2</sub> emissions from agriculture by 45% by 2030 and 60% by 2050 (from a 1990 baseline)
- Managing 50% of the EU's agricultural area through "nature friendly" systems (incl. organic farming) by 2050
- Reduce bycatch to sustainable levels and achieve good environmental status of fisheries and marine ecosystems by 2023 where possible and 2030 at the latest
- Cutting methane and ammonia emissions by 33% and 25% respectively (compared to 2005 levels) by 2030
- Reducing mineral fertilizers, pesticides, and antibiotics use by 50% and the level of the Harmonised Risk Indicator by at least 30% by 2030 (from a 2020 baseline)
- Cut food loss and waste from the farm to the fork by a minimum of 50% by 2030 (compared to 2014 levels). Thereby all actors along the food chain must contribute in the same way. Especially food waste on primary production, manufacturing and distribution levels must increasingly be taken into account. Therefore, establish EU guidelines on how to meet EU food waste and losses reduction targets and develop a common EU methodology for measuring and prevention, including harvest food losses/losses on the field.

**Transforming the livestock sector:** Initiate a transition for EU livestock farming towards circular, extensive livestock production as part of mixed farming systems, through at least the following policy actions: 1) ensure that no CAP funding supports intensive livestock farming and instead use CAP subsidies to support livestock farmers to be part of this transition; 2) set binding maximum livestock density of 2 livestock units per hectare in a revamped Industrial Emissions Directive and replace the Best Available Techniques Reference Document (BREF) on Intensive Rearing of Pigs and Poultry with a BREF for Sustainable Livestock Farming; and 3) adopt new regulations to set maximum levels of nitrogen (170kg/ha as per the Nitrates Directive) and phosphorus per hectare across the EU, in order to bring livestock density within the environmental carrying capacity. The transformation of the livestock sector should always go hand in hand with animal welfare goals.

**Implement a sustainable nutrient management:** Achieve fully circular and localized nutrient management, integrating ambitious targets on reducing mineral fertilizers as part of this policy mix rather than as an isolated point: in addition to the above point on livestock, to the food waste reduction target and to the Integrated Nutrient Management Plan announced in the Circular Economy Action Plan, the Strategy should improve the recycling of nutrients from bio-waste (manure, food waste, non-food organic waste, sewage sludge) into fertilizers through green cover, composting or anaerobic digestion. This should take place primarily in localized nutrients recycling networks to avoid long-distance transport and regional nutrients imbalances. In addition, the EU should set sustainable limits on the share of biomass, which can be taken out of the agri-food system for other purposes (energy, fuel, bio-plastics etc.) based on a robust scientific assessment. This way, the EU can drastically reduce its dependency on synthetic mineral fertilizers.

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**Strengthen local value chains in livestock:** Prepare and adopt an EU Protein Plan to improve the competitiveness of protein crops produced within the EU. The EU livestock sector is one of the largest consumers of imported soy being used as animal feed. Soy production is regularly linked to the destruction of ecosystems and high carbon emissions from land use change. Furthermore, domestic protein crops in Europe can contribute to crop diversity, soil improvement, and bring associated benefits such as more attractive landscapes, less disease and pest pressure, improved nitrogen management, fewer nitrogen emissions, and increased opportunities for local value chains. Therefore, promoting sustainable production of protein crops in Europe for human nutrition and animal feed is important to improve farming in many ways.

**Protect our soil as basis for future productivity:** Fill the legislative gap on soil protection by proposing a legally binding framework to address soil degradation at the EU level, including reducing soil erosion, increase soil health and biodiversity, and tackling soil contaminants (chemicals, heavy metals, microplastics).

**Ensure clean air farming:** Address air pollution from agriculture by accelerating the uptake of ammonia emissions reduction measures listed in the Annex of the NEC Directive, a.o. in CAP Strategic Plans, and by ensuring that the new Methane Strategy covers agricultural sources of methane emissions. Transitioning to less but better livestock production will also benefit air quality.

**Discover and support potentials found in nature:** Implement nature-based solutions on agricultural land, with a particular focus on the restoration of grasslands and peatlands, two major carbon sinks, and on the protection of semi-natural habitats used in agriculture.

**Address the consumption side:** Promote sustainable and healthy diets, with less and better animal and seafood products, through public procurement, fiscal instruments, and stricter regulation of advertising and marketing – including ending EU-funded marketing of livestock and seafood products.

**Strengthen the role of public procurement:** Set minimum mandatory Green Public Procurement (GPP) criteria and targets for sustainable and healthy food, to shift food production and consumption towards more sustainable practices and products, such as sustainably produced wholegrains, pulses, and seasonal fruit and vegetables, and less but responsibly produced animal and seafood products<sup>1</sup>. In addition, mandatory GPP criteria are urgently needed for product ingredients with a high risk of causing land use change such as tropical deforestation worldwide, such as palm oil, soy, beef, cocoa or coffee. Sustainable and healthy food should be one of the priorities of the Commission's actions to boost GPP announced in the Circular Economy Action Plan, and it should also be incentivised through corporate green procurement

**Improve the sustainability of wild fisheries and aquaculture by:**

- Implementation of already existing legislation of the European Common Fisheries Policy (CFP), which includes that all European fish stocks are fished at maximum sustainable yield and full documentation of all fisheries

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- To restore and recover fish stock and protect biodiversity, the EU must ban harmful and destructive fishing practices includes non-selective fishing gear and ensuring that fisheries are fully disclosed and surveilled with 100% monitoring and control of all fishing vessels.
- It crucial to deliver sustainable fishing in combination with key measures that should be taken under the Biodiversity Strategy, such as establishing well managed marine protected areas.
- Ensure the effective management of Marine Protected Areas, including the designation of no-take-areas.
- Recognise the impact of fisheries on ecosystems and provide an environmental impact assessment of all fisheries.

Reduce consumption of fish and seafood in the EU and reduce animal proteins in the feed in aquaculture.

**Use potential to reduce plastic:** Reduce overall packaging waste to no more than 127 kg/capita/year by 2025 and 64 kg/capita/year by 2030, compared to 2016 levels. All packaging must be designed for reuse and recycling, provide transparency on the chemical composition, be separately collected and materials must be sustainably sourced. Reusable packaging should have a share of at least 30% of the market by 2030 for all primary packaging, and of at least 70% for beverage packaging. The target for reusable beverage packaging shall be adjusted according to current market share of refillables. Countries with a higher market share of reusable beverage packaging have to reach the 70% target until 2025, and define targets that are more ambitious thereafter, whereas the other member states have time until 2030 to reach 70%.

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