

Letter to Commission on Taxonomy Regulation from 25 civil society organisations

Brussels, 8 March 2023

Mr Frans Timmermans
Executive Vice-President for the European Green Deal

Mr Valdis Dombrovskis
Executive Vice-President An Economy that Works for People

Ms Stella Kyriakides
Commissioner for Health and Food Safety

Ms Mairead McGuinness
Commissioner for Financial Services, Financial Stability and Capital Markets Union

Mr Virginijus Sinkevičius
Commissioner for Environment, Oceans and Fisheries

Mr Janusz Wojciechowski
Commissioner for Agriculture

Please reply to:
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Dear Vice-Presidents and Commissioners,

Forthcoming Taxonomy Delegated Act on agriculture and request for meeting

We are writing regarding the important and helpful report published in October 2022 by the Commission's expert group, the Platform on Sustainable Finance (PSF), setting out technical screening criteria for determining what forms of animal production make a substantial contribution to biodiversity and ecosystems. **We urge the Commission to closely follow the advice of its expert group in producing an EU Taxonomy on agriculture particularly as regards the benefits of integrated crop-livestock production that does not lead to agriculture expansion.**

It is vital that the taxonomy Delegated Act does not recognise industrial livestock production as an environmentally sustainable economic activity. Industrial livestock production causes substantial environmental harms both in the vicinity of the farm and through the upstream activities of producing cereals – wheat, maize, barley and oats – to feed the animals. The Commission states that [nearly two thirds](#) of EU cereals are used as animal feed.

Production of cereals for feed is mostly carried out intensively, in monocultures, with abundant use of agro-chemicals. This leads to [soil degradation](#), [biodiversity loss](#), overuse and pollution of [water](#), as well as [air pollution](#). Thus, significant harm is done to three of the Taxonomy Regulation's environmental objectives.

The EU relies on the import of huge amounts of soy as animal feed, mostly used in the industrial pig and poultry sectors. The recitals of the new Regulation on deforestation state that EU soy imports represent the second largest share of EU-driven deforestation which leads to biodiversity loss and the release of high quantities of stored carbon. This does significant harm to two of the Taxonomy Regulation's environmental objectives.

Industrial livestock production cannot make a substantial contribution to the Regulation's climate objectives. On the contrary, the Intergovernmental Panel on Climate Change (IPCC) [has said](#): *“producing animal-sourced food (e.g., meat and dairy) emits larger amount of GHGs than growing crops, especially in intensive, industrial livestock systems”*.

In December 2022 the EBRD published an updated *Methodology to determine the Paris Agreement alignment of EBRD investments*. This classifies non-ruminant livestock with non-negligible emissions as a “high-emitting sector” and states that the emissions emanating from feed supply must be included when calculating livestock's emissions. The figures set out in the Annex of this letter indicate that pigs and poultry produce emissions that cannot be categorised

as 'negligible'. It would be anomalous for a Commission Delegated Act to recognise intensive pig and poultry production as Taxonomy-aligned, while the EBRD classifies it as a high-emitting sector.

The Annex of this letter provides more elements about why industrial livestock is environmentally harmful, and summarises the relevant inputs provided by the PSF report.

We appreciate that the Commission is under considerable pressure to greenwash the industrial livestock sector. However, we urge you to clearly recognise that industrial livestock production does significant harm to the Taxonomy Regulation's environmental objectives and is unable to make a substantial contribution to any of them.

If the Commission is not prepared to fully align with the PSF proposal, we would prefer there to be no Delegated Act on agriculture than a greenwashed one. A Commission Delegated Act that recognises industrial livestock production as Taxonomy-aligned would be inconsistent with Articles 10, 17(1) and 19(1) of the Taxonomy Regulation: accordingly, we would have to publicly oppose such a Delegated Act and consider every appropriate action to challenge it.

We would kindly request a meeting with you to discuss a constructive, science-based way forward on livestock.

Yours sincerely,

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Compassion in World Farming

Peter Stevenson, Chief Policy Advisor

WWF European Policy Office

Ester Asín

NABU (Nature and Biodiversity Conservation Union)

Leif Miller, CEO

Rainforest Action Network

Merel van der Mark, Senior Finance Campaigner

European Environmental Bureau

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John R. Spruill, Director

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Christine von Weizsäcker, President

Irish Seed Savers Association

Elaine Bradley, General Manager

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Karin Dubsky, Coordinator

Irish Peatland Conservation Council

Tristram Whyte, Policy Officer

Hedge Laying Association of Ireland

Shane Downer, Executive Officer

An Claiómh Glas

Attracta Uí Bhroin, Vice-Chair

World Animal Protection

Mark Dia, Global Farming Programme Director

Annex

Integrated crop-livestock systems

The October 2022 EU Platform on sustainable finance's (PSF) report includes a helpful proposal for assessing whether livestock activities make a substantial contribution to biodiversity and ecosystems. The PSF report adds that its proposal is equally applicable to assessing whether livestock operations make a substantial contribution to (i) sustainable use and protection of water and (ii) pollution prevention and control. The report's emphasis on the value of on-farm nutrient creation and cycling and on-farm feed production is also relevant to the transition to a circular economy.

The PSF report describes how in an integrated crop-livestock system the nitrogen (N) needed as nutrients for crops is primarily produced on the farm through animal manure and biological fixation, e.g. the inclusion of legumes in rotations. It states that the animals act as "*onsite nutrient recyclers*". They are mainly fed on crops and grass grown on the farm, with the N in their excretions being used to fertilise the holding's crops and pasture.

In a well-run integrated farm, the use of synthetic fertilisers is minimal and the number of animals raised does not exceed the farm's capacity to use their manure to fertilise crops or pasture. As a

result there is much reduced pollution of water and air. Such farms are truly circular and can make a substantial contribution to the Regulation's circular economy objective.

In particular, the PSF proposal:

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- Requires a maximum farm-gate N balance i.e. N-inputs must not exceed N-outputs by more than a specified amount;
- Emphasises the need to primarily use organic manure and biological N fixation (e.g. by the use of legumes) with only minimal use of chemical fertilisers. Version 2 of the proposal requires at least 80% of N fertilisers to be organic fertilisers produced on-farm; a maximum of 20% can be bought-in chemical fertilisers;
- Requires, in version 2 of the proposal, all livestock excreta to be recycled on-farm or treated through nature-based solutions;
- Includes the N in bought-in feed when calculating a farm's N balance and, in version 2, limits the proportion of bought-in feed such as cereals and soy to 10% of total feed. Version 2 requires a farm to grow at least 75% of any livestock feed on-farm and get the rest locally/from certified sources. This 75% cannot be grown intensively; it must be either grazed, or must comprise agroecology outputs such as catch crops and cover crops.

The October 2022 PSF proposal adds to its March 2022 proposal that animal production can be regarded as making a substantial contribution to biodiversity through (i) extensive grazing in habitats where grazing is beneficial for biodiversity and (ii) the farming of rare breeds.

Climate change

The [IPCC report](#) published in April 2022 said that a higher share of plant protein, with just moderate intake of animal-source foods "*could lead to substantial decreases in GHG emissions*".

While intensive pig and poultry operations have lower GHG emissions than ruminant production, they nonetheless produce substantial emissions. These are due to emissions from manure management, deforestation associated with soy production, and the manufacture and application of the synthetic fertilisers that are used to grow feed crops for intensively farmed animals.

A [report prepared by Blonk for World Animal Protection](#) states regarding broiler chickens: "*Climate change impacts for conventional production range from 1.8 to 2.4 kg CO₂eq/kg carcass weight chicken produced; this range increases from 2.6 to 5.8 kg CO₂eq/kg carcass weight when direct land use change emissions are included*".

For pigs the Blonk report states: "*Climate change impacts for conventional production range from 4.1 to 4.8 kg CO₂eq/kg carcass weight pork produced; this range increases from 4.8 to 6.8 kg CO₂eq/kg carcass weight when direct land use change emissions are included.*" The emissions from both broilers and pigs [are very much higher than those from plant foods](#).

The emissions from industrial livestock production are clearly not anchored in Paris-compatible pathways. Article 10.1(f) of the Taxonomy Regulation provides that substantial contribution to climate change mitigation can be achieved by "*strengthening land carbon sinks, including through avoiding deforestation, sustainable management and restoration of croplands, and regenerative agriculture*".

However, the huge quantity of cereals needed to feed industrial livestock are produced intensively in ways that [impede sustainable management of croplands](#) and degrade soils [so undermining their ability to store carbon](#). Moreover, the large amount of land needed to produce feed cereals is a barrier to the introduction of regenerative agriculture, while also preventing the restoration of native biomass which could [sequester large amounts of carbon](#). The import of soy as feed fuels deforestation. Clearly industrial livestock production cannot meet the criteria of Article 10.1(f) for qualifying as contributing substantially to climate change mitigation.

March 2023