

## **Civil Society support for revising the Industrial Emissions Directive to limit pollution from the livestock sector's biggest emitters**

**As a group of 21 civil society organisations, we would like to show our support for the revision of the Industrial Emissions Directive, which is essential to limit the impact of the biggest polluters in the livestock sector.**

We witnessed with great concern the unsubstantiated claims made by certain policy-makers during the 26 September Agriculture and Fisheries Council and the 30 September meeting of the European Parliament's Agriculture Committee regarding the Industrial Emissions Directive (IED), in which they stated that the revision of the directive would disproportionately affect family farms, which is not the case, as it focuses exclusively on Europe's biggest industrial livestock farms.

We applaud the fact that the current proposal by the European Commission regulates industrial farms with 150 or more Livestock Units (LSU) and includes cattle rearing. These are minimum requirements that must be maintained and strengthened if the EU wants to tackle the major health and environmental pollution caused by its livestock sector. At the same time, we also call for stronger pollution prevention and animal welfare protection measures within the directive.

### **The Directive covers only a small fraction of farms responsible for most emissions**

The claims that the directive will affect all family farms across Europe are false. There are only 185,000 industrial farms with 150 LSU or more in Europe. They represent only 7.5%<sup>1</sup> of the total 2.5 million livestock farms in the EU<sup>2</sup>. Yet, these few large industrial farms account for as much as 60% of the EU livestock sector's emissions of ammonia and 43% of the methane emissions – as identified in the European Commission's Impact Assessment. Meanwhile, the industrial livestock farms included in the current directive are only responsible for as little as 18% of ammonia and 3% of methane emissions. These numbers show the necessity of introducing new policies to reduce the pollution generated by the sector – especially by the largest industrial farms – and to encourage more sustainable farming models that work for conscientious farmers using environmentally-friendly practices.

### **Failing to regulate the biggest emitters will make it impossible for the EU to address the climate, health and environmental crises**

The EU will not be able to meet its commitments made under the Global Methane Pledge (reduction of 30% by 2030) and the European Green Deal without tackling methane emissions in the

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1 The figure of 13% present in the European Commission's communications considers only non-subsistence farms.

2 Eurostat (2016). Farms and farmland in the European Union - statistics. [https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Farms\\_and\\_farmland\\_in\\_the\\_European\\_Union\\_-\\_statistics#Farms\\_in\\_2016](https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Farms_and_farmland_in_the_European_Union_-_statistics#Farms_in_2016)

livestock sector<sup>3</sup>. Livestock farming is responsible for 53% of the EU's methane emissions<sup>4</sup>, higher than the global average of 32%. Under currently-planned measures, these emissions are only expected to fall a negligible 3.7% by 2030<sup>5</sup>. The proposal to include cattle and other industrial farming activities with at least 150 LSU would allow an additional methane reduction of 2-4% per year<sup>6</sup>. Considering its leading role in creating the Global Methane Pledge and the above-average contribution of its livestock farming sector, the EU must take a leading role when it comes to methane reduction in animal farming.

The European livestock sector also contributes significantly to other health and environmental impacts, including 80% of soil acidification and air pollution (with emissions of ammonia and nitrous oxide) and 73% of water pollution (through nitrogen and phosphorus pollution) caused by the agricultural sector in the EU<sup>7</sup>. Furthermore, several studies have linked intensive livestock production to human and animal health risks, concluding that there is a higher risk of developing respiratory diseases for the population living near facilities used for intensive rearing<sup>8</sup>.

**By focusing only on these largest industrial farms, the IED would be targeting the biggest methane and ammonia emitters without affecting the vast majority of farms.**

## **A robust permitting system is needed to limit rampant air, water and soil pollution**

Expanding the scope of the IED will not have any significant effect unless these industrial activities are subject to a **robust permitting system with strict pollution prevention measures and animal welfare safeguards**. We are therefore highly concerned by the introduction of a "light" permitting system for animal rearing and strongly reject its extension to the biggest industrial pig and poultry farms that are already regulated by the full IED regime, as this constitutes a blatant regression in environmental protection and contradicts the polluter-pays principle.

Furthermore, applying the proposed new light permitting regime to all other livestock operators is highly problematic, as it is substantially weaker and less enforceable than the current obligations, and even more so compared to the improved provisions proposed by the Commission, which will apply to all other IED sectors. This "agricultural exceptionalism" is not justified by the high levels

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3 CE Delft (2022). Methane reduction potential in the EU between 2020 and 2030. <https://cedelft.eu/publications/methane-reduction-potential-in-the-eu-between-2020-and-2030/>

4 European Environmental Agency (2021). EEA greenhouse gases- data viewer. <https://www.eea.europa.eu/data-and-maps/data/data-viewers/greenhouse-gases-viewer>

5 CE Delft (2022). Methane reduction potential in the EU between 2020 and 2030. <https://cedelft.eu/publications/methane-reduction-potential-in-the-eu-between-2020-and-2030/>

6 Idem.

7 Adrian Leip et al. (2015). Impacts of European livestock production: nitrogen, sulphur, phosphorus and greenhouse gas emissions, land-use, water eutrophication and biodiversity. *Environmental Research Letters* 10. <https://iopscience.iop.org/article/10.1088/1748-9326/10/11/115004/pdf>

8 Smit, L., Heederik D. (2017). Impacts of Intensive Livestock Production on Human Health in Densely Populated Regions. *Geohealth*. <https://agupubs.onlinelibrary.wiley.com/doi/full/10.1002/2017GH000103>

of pollution caused by intensive livestock farming. Finally, an even more unjustified and dangerous white card for polluters is represented by the “registration system”. This would give industrial livestock farms the possibility to derogate entirely from the permitting system, and so must be rejected.

**To ensure that the livestock farming sector contributes to the European Green Deal and Zero Pollution goals, the new scope proposed by the European Commission needs to be upheld and the pollution prevention measures applied to the livestock sector must be strengthened. We stand ready to support this in our role as civil society organisations with environmental and animal welfare expertise.**



## National signatories

