

CC(13)10035:1 –AA/sd

Mr Johannes Laitenberger
Head of Cabinet
Cabinet of José Manuel Barroso
European Commission
200, rue de la loi
BE-1049 Brussels

Brussels, 12th December 2013

Re: The review of the EU Air Policy

Dear Sir,

Copa-Cogeca has closely followed the discussions and the technical work carried out by IIASA and the European Commission in order to assess the review of the EU Air Policy. The sector is expecting the air quality package to be adopted with concern and uncertainty about how the Commission's objectives may impact the agricultural activity in the near future.

From the beginning of the process, agriculture has been singled out alongside other sectors being one of the Commission's major concern ammonia emissions and their impact, as well as particulate matter (PM). The Commission has insisted on several occasions that agriculture's potential to reduce ammonia emissions by 30-40 % can be achieved with 'reasonably cheap measures'.

We regret to highlight that Copa-Cogeca does not share this opinion. Currently, there are too many uncertainties in the data for sensible or robust limit values to be set.

Our biggest concern is whether any proposals are realistic, achievable and cost effective all over the EU-28. European farming sector's competitiveness would be seriously undermined by further ammonia emission reduction targets. Today, the EU is preparing for the opening of markets and removal of trade barriers in agriculture. In this context, more stringent production constraints in the form of stricter requirements on ammonia or PM emissions would be a threat to EU agriculture's viability. Moreover, it must be ensured that emissions reductions already achieved by European farmers are fully recognised, in order not to discourage early movers from taking future action. According to the EEA⁵¹, ammonia emissions decreased in the EU-27 by 28%, mainly as result of improved manure management and decreased use of nitrogenous fertilisers (especially urea-based), and the trend would remain provided coherence with other EU legislation. This is possible thanks to "green growth", which is at the core of sustainable agriculture. It allows EU farmers to deal with environmental challenges: to increase profitability while improving resource efficiency, carbon sequestration and reducing GHG emissions. We are not starting from a zero baseline.

Copa-Cogeca rejects as unrealistic and highly damaging for European agriculture possible Commission proposals to go beyond ambitious commitments already undertaken in the Gothenburg Protocol, reportedly taking the form of ammonia reduction targets of 30-35 % with a 2005 baseline. Farmers' commitments to achieve increased efficiency and long-term

⁵¹ EEA Technical Report 10/2013 – European Union emission inventory report 1990-2011 under the UNECE Convention on Long-range Transboundary Air Pollution (LRTAP).

investments towards emission reduction (air pollutants as well as greenhouse gas) need to be acknowledged so that early movers are not penalized for early action. Hence, should the Commission nevertheless propose reduction targets for 2030 that go beyond the Gothenburg Protocol, it is paramount that a flexible baseline year for such reduction between 1990 and 2005 is established. Moreover, the emission ceilings laid down in the NECD should not prescribe more ambitious abatement measures than what is seen as Best Available Techniques conclusions on ammonia in the Reference Document for intensive poultry and pig rearing (BREF BAT)⁵², because this could lead to a demand for implementation of techniques at the farms which are beyond what is regarded as economically available.

We support identification of synergies between these the climate change and the air quality policies. Agricultural greenhouse gas emissions reduction are targeted by different pieces of legislation. Besides, we believe that Rural Development policy can offer room for action via voluntary measures to continue encouraging farmers' uptake. The farming sector does expect reductions in greenhouse gas emission to be achieved through production efficiencies, including better management of feed, manure management and also improvements in plant and animal genetics. Many of these actions will result in reduced ammonia emissions and hence contribute to reduce PM.

Copa-Cogeca's view on PM is that there still appears to be much uncertainty about the sources of emissions, how particulates are formed and under what conditions they are formed, and even with respect to emission profiles for other sectors. PM emitted by agriculture consists mostly of larger particles (larger than 2.5 and even 10 µm), which are considered less of a health concern than smaller sized particles (i.e. PM_{2.5}). Furthermore, the composition of PM from agriculture is biological and not chemical. A more clear distinction should be made between chemical and biological PM. Much more scientific work is needed to gain a better understanding of these emissions and what could be done to address them before limit values are set.

The potential costs and benefits of any new measures must be fully considered. As such, the upcoming Review needs to take into account and integrate different economic, but also environmental priorities, in order to identify better ways of achieving environmental outcomes. To achieve this, any further integration of policies must provide win-win approaches, taking into account the crucial aspect of the viability of farming.

We therefore strongly believe that the way forward is to ensure that cost-efficiency and stability for already undertaken long term investments are embedded in the adjustments to be made to the regulatory actions (e.g. the NECD) under the umbrella of the new EU Thematic Strategy on Air Pollution. The final aim is to ensure that the competitiveness of the EU farming sector is maintained and food security ensured.

We hope that these comments will be granted your full consideration and we are available for further discussions or questions on this topic.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Pekka Pesonen', followed by a long horizontal line.

Pekka Pesonen
Secretary General

⁵² Industrial emissions directive, 2010/75/EU.