
From:

Sent: Thursday, July 19, 2012 2:35 PM

To: ENV AIR

Cc:

Subject: Re: Additional comments from COPA following the meeting on the 21st June 2012

For the attention of Ms

Supplements in remarks carried by (UNF) in her response, it seems important to stress the following points:

- Documents of June 21th list the techniques to reduce emissions. Levels of actions are already known and often more or less used. Depending on the penetration of these techniques (animal feeding, animal housing etc.) between sectors and countries, the level of emission reduction hoped from a country or/and a sector will not be the same as in another country or/and sector. It seems important to take into account the efforts already made before the definition of new measures.
- If some techniques in place to protect the air quality can contribute to a reduction of negative impacts on environment (water, GHG), sometimes the low emission techniques used result increase of GHG (antagonistic effects). This is also true between the techniques implemented to protect water, air protection etc.. Thus, farmers may be faced with difficult choices in relation to the implementation of certain techniques. We consider very important that countries provide, as part of their regulation, consistency of actions to protect the environment, without compiling regulatory requirements that may result in an impasse for technical operators.
- It is interesting that the cost of measures put in place (covering pits, spreading equipment) is reported. This point should lead to reflection on how to allocate financial means.

Therefore the choice of using a range of mechanisms that are not all regulatory but also volunteers seems a good solution. According to different soil and climatic context and, to variable sensitivity of ecosystems in Europe, it is important not to want implementing the same rule everywhere

Kind regards

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Le 13/07/2012 18:40, a écrit :

For the attention of Ms

As per the e-mail of my COPA colleague, _____, of the 11th July 2012 these comments may well be supplemented by additional comments from other COPA members.

Just as a general introductory comment, we are pleased with the participatory nature of the discussions. We are also reassured by the message from the Commission that no firm conclusions have been reached on a way ahead at this stage and encouraged by the fact that a range of mechanisms (including non-regulatory) are being considered as part of the review.

I will restrict my comments to the following documents presented on the 21st June.

Future emissions of air pollutants in Europe – current legislation baseline and the scope for further reductions

3.4 Land use and agricultural activities

- References to a 'Healthy diet' scenario. I'm not too sure that this is defined anywhere but it is certainly not well explained. The key thing from our perspective is that the emissions emitted per kg is a better indicator than meat consumption.
- I am unsure of the assumption that fertiliser use will increase due to increased biofuel production. This seems unlikely to me, personally. It seems more likely that fertiliser use will be linked to area of land that is cropped rather than biofuel production.
- The assumptions do not take into consideration that there are a number of other drivers which will impact either directly, or indirectly, on ammonia emissions. See more below.

Emissions from agriculture and their control potentials

Although I agree, to an extent, with the summary which states that 'No fundamentally new insights and new techniques have emerged over the last decade. However, in the last 10 years, the known techniques have been applied at a much larger scale in an increasing number of countries....' my general comment on this is that there are a number of other drivers which will now will impact either directly, or indirectly, on ammonia emissions.

Production efficiencies. So we do expect a number of production efficiencies to take place in agriculture (as a result of many drivers but including high input prices – which have increased by about 20 % in the past 2 years in England and Wales alone) in the next few years. These include better management of feed, energy, improvements in manure management, and also improvements in plant and animal genetics.

A good example is heat exchangers. These have been adopted by the poultry sector particularly over the past few years, mainly as a result of the need to reduce energy costs, but trials by the Environment Agency in England have shown that ammonia emissions can be reduced by some 30-60 %. This is a

sizeable reduction and I am surprised that these sorts of technologies are not included in the report.

Industry-led action. To what extent can voluntary measures / or industry-led measures be included in the report and recognised for what they can deliver? Voluntary action in various forms are being taken by the agricultural sector to improve farmers' awareness and encourage greater improvements in environmental performance. Examples include the Greenhouse Gas Action Plan <http://www.nfuonline.com/News/Industry-targets-3m-tonne-CO2-reduction/>, setting out how the agricultural sector in England will reduce its greenhouse gas emissions. The aim is to reduce emissions by three million tonnes of CO2 equivalent per year from 2018-2022. Again, this action and activity may well have an indirect impact on ammonia emissions.

In summary, I think what I am saying is that we shouldn't look at these measures in different silos – they will all have a role and an impact on ammonia emissions and should be taken into consideration.

Welfare standards. I am pleased that the report recognises that welfare standards are important – not only have producers to meet legislative standards, many retailers and supermarkets also have a big interest in maintaining high welfare standards – but also that some welfare requirements can lead to increased ammonia emissions. These two goals – welfare and environment – can be at odds or in conflict with each other and I don't think that this particular aspect of the debate is drawn out enough.

Kind regards

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