

CC(22)1927:1 – PP/na

Commissioner Wojciechowski
Rue de la Loi, 200
1040 Brussels
Belgium

Brussels, 4th April 2022

Subject: Revision of the Industrial Emissions Directive

Dear Commissioner Wojciechowski,

In the context of the revision of the Directive 2010/75/EU of the European Parliament and the Council on industrial emissions (Industrial Emissions Directive, hereinafter), Copa and Cogeca would like to share with you their preliminary views on the envisaged amendments, in particular in reference to 1) a change to the thresholds for poultry and pig meat installations and 2) the inclusion of bovine within the scope of the Directive.

EU farmers and their cooperatives support the general objectives of the EU Green Deal as an opportunity to enable a fair cross-sectoral approach in the EU climate and agricultural policy. Besides reduced emissions, the solution lies in enabling farmers investments and ensuring the long-term economic viability of and a simplified, transparent regulatory framework for the agricultural sector. The Commission proposal is too ambitious for the current EU farming reality.

In addition, given that the unprovoked Russian invasion of Ukraine has further destabilised already fragile agricultural markets, affecting prices in all commodities (including agro-food products), a sustainable approach to any and every revision of EU legislation must be ensured. In the case of the Industrial Emissions Directive, this means striking a balance between the pursuit of the envisaged environmental goals (protecting human health and the environment), access to the necessary technologies, and the economic and social consequences arising from the administrative and economic costs associated with the amendments above.

The inclusion of the bovine sector within the scope of the Directive, setting very low thresholds to the sector despite having little experience in dealing with these aspects, will result in high administrative and economic costs (associated with changes to installations, permits for animals and consultancy services, among others). In certain Member States like France, for instance, this could amount to affecting approximately 85-90% of French family dairy farms. For beef farms, it is estimated that a similar percentage of farms will be affected.

Farms rearing poultry or pigs above the existing thresholds face high bureaucratic burdens, impacting their labour demand and costs of production. In particular, this translates to the need to hire external (and expensive) consultants to produce yearly IED-reporting. Even before the revision, poultry and pig holdings made up the largest share of installations permitted under the IED, accounting for more than twenty thousand (20.045) out of fifty-one thousand (51.615) operators under the scope of the IED. According to our estimations, the current Industrial Emissions Directive covered up to 5% of the pig and poultry holdings in the European Union, but a very high share of the total production. With the envisaged change in thresholds relating to poultry and pig installations, this percentage could affect more than 50% of farms in these sectors.

These new thresholds do not subscribe to a cost-efficient approach since they will only lead to a small decrease in ammonia emissions, whilst creating an unbearable increase in economic and administrative burdens. Moreover, costs linked to best available technology must be taken into account for investment periods of more than twenty-five (25) years for livestock buildings,

contradicting the Preliminary Impact Assessment which only anticipated small and short-term impacts. This PIA also fails to reflect the social impact on farms that are likely to be targeted and subjected to negative public scrutiny.

Finally, aggregation rules will exacerbate the reach of these low thresholds. Indeed, if installations in close proximity engaged in economic and legal relationships, but under different operators, are considered as a single installation, an even higher number of installations will be subject to the requirements of the Directive, resulting in even greater economic impacts.

From the perspective of Copa-Cogeca, any further inclusion of small and medium farms for poultry, pig or bovine production to the scope of the Industrial Emissions Directive is inappropriate. This will only result in European family farms bearing disproportionately high economic burdens without making any significant contribution towards achieving environmental goals. In practice, very small units with approximately 60 cows with heifers and young stock will be included. The same would apply to poultry and pigmeat farms. By no means can these small units, or rather micro-enterprises, be called 'industrial' in line with the Directive scope.

As farmers, we are integrated in the local environment, and we are the first ones to feel the consequences of climate change. As such, we place a high importance on devoting our best efforts towards ensuring that production both meets consumer demands whilst being respectful of the environment and responds to the needs of our local communities. While we continue our work towards more sustainable agricultural practices, in the current humanitarian crisis, we must comply with our duty to provide sufficient and safe food to European citizens and a fast-growing global population. We are currently struggling to make the necessary investments and, therefore, need the European Institutions' support.

Changing the scope of the IFD would hit our European animal production hard along with its family farming model that already follows the highest animal health and welfare as well as environmental standards in the world. The Commission plans would only make it harder for sectors such as pigmeat which have suffered major economic hardship, made worse by the ongoing crisis in Ukraine.

We would highly appreciate your reconsideration of the above-mentioned amendments to the Industrial Emissions Directive. In particular, revising the envisaged thresholds, considering a transition period that is mindful of the current production cost inflation and food security crisis, the planned necessary investments, access to technologies, consistency with trade policy and the associated administrative and economic costs.

Please do not hesitate to contact us, should you need any further information.

Yours Sincerely,

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