

# Letter to Commission on Taxonomy Regulation from 36 civil society organisations

Brussels, 19 July 2021

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

Ms Stella Kyriakides  
Commissioner for Health and Food Safety

Ms Mairead McGuinness  
Commissioner for Financial Services, Financial Stability and  
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Mr Virginijus Sinkevičius  
Commissioner for Environment, Oceans and Fisheries

Mr Janusz Wojciechowski  
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**Dear Vice-President and Commissioners**

## **Forthcoming Taxonomy Delegated Act on agriculture and request for meeting**

The undersigned organisations urge you, when drafting the new Taxonomy Delegated Act on agriculture, to rethink the Commission's approach to animal farming. The first Delegated Act, from which agriculture was eventually removed, recognised industrial livestock production as a sustainable economic activity, provided that good manure management measures are adopted.

We are not against animal farming per se. We consider that when animals are raised in organic, agro-ecological or integrated crop-livestock systems, or on well-managed permanent grassland, they can contribute to several of the Taxonomy Regulation's environmental objectives and do no significant harm to any of them. Indeed, the Commission's EU Biodiversity Strategy recognises these as sustainable practices.

Industrial livestock production, however, causes significant environmental harms. ***Recognising industrial livestock production as an environmentally sustainable activity in a new Delegated Act would be at odds with overwhelming environmental scientific evidence and would undermine the EU Green Deal and the EU Biodiversity and Farm to Fork Strategies.***

Industrial livestock production is not environmentally sustainable for the following reasons:

**1. Harm arising from use of cereals and soy as feed for industrial livestock:** The draft Delegated Act (DA) included some helpful provisions on the use of grassland for raising livestock. It also addressed crop production on livestock farms. However, most industrial livestock operations do not produce crops. The cereals – wheat, barley, oats and maize – used as animal feed are usually grown, not on the livestock farm, but on completely separate arable farms.

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. These upstream harms were largely ignored by the initial draft DA, resulting in industrial livestock operations being presented as sustainable.

In addition, the EU relies on the import of huge amounts of soy as animal feed, mostly used in the industrial pig and poultry sectors, as well as intensive dairy operations. This contributes to several environmental harms, including deforestation in South America, which leads to biodiversity loss and significant increases in carbon emissions, in direct contradiction to two of the Taxonomy Regulation's environmental objectives. The initial draft DA required soy to be "certified by a recognised body". However, the majority of certification schemes for soy [have not proven effective](#) in preventing deforestation so far.

**2. Air pollution:** Animal husbandry, especially industrial livestock production, is a major source of [ammonia](#), which arises both from manure production on farms and fertilisers used to grow feed crops. Intensive pig and poultry production releases [significant emissions](#) of ammonia, methane, and sulphur dioxide as well as other pollutants that can have deleterious health effects. Research in [Italy](#) shows that (industrial) livestock is the second most important source of fine particulate matter pollution.

**3. Water pollution:** Feed production for industrial livestock consumes huge quantities of nitrogen fertilisers. However, only 30-60% of this nitrogen is taken up by [feed crops](#). [Pigs and poultry](#) assimilate less than half of the nitrogen in their feed; most is excreted in their manure. The unabsorbed nitrogen runs off or leaches to pollute rivers, lakes, groundwater and marine ecosystems. The European Nitrogen Assessment has estimated that nitrogen pollution alone costs Europe between [70 and 320 billion euros per year](#).

**4. Biodiversity:** The initial draft DA's section on biodiversity only looked at high-nature-value and high-biodiversity land. However, the harm resulting from the production of cereals for feed is not confined to biodiversity in these special lands as [nearly two thirds](#) of EU cropland is farmed intensively to provide animal feed. The loss of pollinators, for instance, occurs in much of the EU's farmland, not just in high-nature-value land.

**5. Circular economy:** The initial draft DA stated that the impact of livestock on the transition to a circular economy is 'non-applicable'. However, industrial animal production is an inherently linear system that completely disrupts the nitrogen cycle and causes water and air pollution, while organic, agro-ecological, integrated or extensive animal farming systems can be genuinely circular. Through *Do No Significant Harm* criteria the DA's section on the circular economy must set up minimum requirements to ensure a transition towards circularity in animal farming.

**6. Industrial livestock production is not a 'transitional' activity:** The initial draft DA recognised livestock production as a transitional activity under Article 10(2) of the Regulation which states that an activity "*shall qualify as contributing substantially to climate change mitigation where it supports the transition to a climate-neutral economy consistent with a pathway to limit the temperature increase to 1,5°C above pre-industrial levels*".

Industrial livestock production does not support the transition to a climate-neutral economy. On the contrary, [feed production](#) for industrially raised animals involves substantial GHG emissions arising from the manufacture of [fertilisers](#) to grow feed, the [application](#) of those fertilisers, and deforestation resulting from [soy production](#).

The limited ability of the livestock sector to support the transition to a climate-neutral economy has also been recognised by the Technical Expert Group's report. This stressed that for emissions from agriculture to decrease, in absolute terms, and to move towards net-zero targets by mid-century, an overall reduction in per-capita consumption of livestock products is essential.

This proves that industrial livestock production does not fall within the Taxonomy Regulation's definition of a "transitional activity".

**Need for dietary change:** Overwhelming [scientific evidence](#) on health and the environment as well as all 1.5°C climate scenarios require a large reduction in the consumption of animal products. The Taxonomy Regulation must send a clear signal to move away from the use of food crops as feed and towards the use of grass and waste/residues streams, in order to drive a transition towards less and better animal products, raised extensively instead of industrially.

**Given the above, we call on you to set up clear taxonomy criteria for livestock production that would only allow organic, agro-ecological or integrated crop-livestock systems or systems on well-managed extensive permanent grassland to be considered environmentally sustainable under the EU Taxonomy.**

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

Yours sincerely,  
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