

To: Agriculture Ministers of EU Member States

Cc: Executive Vice-President for the European Green Deal and Commissioners for Environment, Health & Food Safety and Agriculture, and the Chairs of the European Parliament Agriculture and Environment Committees

Re: Input to the EU Agriculture and Fisheries Council Meeting, Brussels, 20 March 2023

Brussels, 13 March 2023

Dear Minister,

On behalf of the European Environmental Bureau, I am writing to share with you our views on some of the issues on the agenda of the forthcoming EU Agriculture and Fisheries Council on 20 March 2023. We have structured the letter according to our understanding of the Council Agenda, mainly focusing on your deliberations within our expertise and priorities.

I invite you to take our concerns into account during the final official level preparations, as well as at the meeting itself. I would also like to take this opportunity to request a meeting with you in order to discuss our input and recommendations.

1. Market situation in particular following the invasion of Ukraine

The knock-on effects of the Russian war in Ukraine on our agri-food system highlight the need for the EU to reduce its dependency on imports of non-renewable energy sources, mineral fertilisers, and grains and oilseed for feed. Furthermore, the crisis shone a light on the imperative to prioritise the use of crops for food over feed; which requires a transition away from the overproduction and overconsumption of animal proteins. This is consistent with the vision and concrete objectives set out in the Farm to Fork Strategy and other European Green Deal initiatives and would strengthen the resilience of the EU's food system to external shocks. While current disruptions to agricultural markets jeopardise the food security of import-dependent low-income countries, the evidence is unequivocal (as [confirmed by the Commission](#)) that food availability is not an issue in the EU. On the other hand, financial access to food is a rising challenge for low-income populations and the climate and environmental crises jeopardise the natural resources our food production relies on. In other words, poverty and unsustainable agriculture are the real threats to European food security.

We therefore call upon the Agriculture and Fisheries Council to:

- Stand firmly behind the European Green Deal and the Farm to Fork and Biodiversity Strategies, whose objectives – moving towards sustainable and resilient food systems and reversing biodiversity loss – are as relevant and urgent as ever in the current context, and therefore ensure that all crisis measures are coherent with the European Green Deal and protect and progress the right to food, by strengthening local food systems grounded in the principles of agroecology;
- Accelerate the move towards circular nutrients management, in line with the Circular Economy Action Plan, by supporting farmers to reduce, and eventually phase out, the use of synthetic

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fertilisers, substituting them with safe organic fertilisers and compost, as well as wide crop rotation, leguminous crops, and green manures; and by rapidly halving food waste at all levels of supply chains;

- Facilitate a just and speedy transition away from industrial animal farming and towards extensive, mixed and circular farming systems, as well as towards ‘less and better’ meat, dairy and egg consumption, to reduce the demand for cereals as feed;
- Refrain from using ungrounded “food security” arguments to justify watering down of environmental ambitions in the Common Agricultural Policy or other policies and laws.

2. Regulation on nature restoration: Agricultural and forestry aspects (Information from the Presidency)

The legal proposal for the Nature Restoration Regulation is a huge opportunity to bring nature back to Europe in order to address the interrelated climate and biodiversity crisis. Restoring ecosystems can mitigate the climate crisis by capturing and storing carbon, it will also help to address key climate risks for agriculture by decreasing flood or drought risks. It is also an opportunity to contribute to long-term food security and increase the resilience of our food production. Restoring nature can also bring many socio-economic benefits such as additional jobs in rural areas, sustainable farming, recreation opportunities, and broader human health benefits. The European Commission’s impact assessment concluded that investing in nature restoration adds between €8 to €38 in economic value for each €1 spent given the many ecosystem services which play an invaluable role in supporting food security, climate and ecosystem resilience and mitigation, and human health.

We therefore call upon the Agriculture and Fisheries Council to:

- Fully support the proposal for the Nature Restoration Law and positions of the Environment Ministers who should continue to lead the discussions on the proposal towards a strong Council position that can ensure the timely and adequate adoption of the law;
- Endorse the agricultural targets in recognition of the important role of high diversity landscape features for farmland biodiversity, pollination, climate adaptation and with that long-term food security;
- Endorse peatland restoration targets recognising their importance in carbon sequestration and supporting economic activities such as palludiculture. [EU could reduce up to 25% of its agricultural emissions by rewetting 3% of the EU’s agricultural land](#) which are currently drained peatlands used for agriculture;
- Endorse the forest restoration targets (both in articles 4 and 10), proposed in full compliance with the principle of subsidiarity, based on the EU’s competence for environmental matters and crucial for climate mitigation and adaptation as well as the long-term survival of a forest industry;
- Support the demands for a dedicated nature restoration fund and integrate a commitment in the legal proposal to consider such a fund as part of the next Multiannual Financial Framework period.

For more information, see [Nature restoration and food security: Why bringing back nature cannot wait](#) as well as [NGO analysis of the EC proposal for a regulation on nature restoration](#)

3. Report from the European Pigmeat Reflection Group (Information from the Commission)

The EEB took part in the European Pigmeat Reflection Group and actively contributed to the discussions that led to the elaboration of this report. However, we do not support the recommendations of the report, which do not include any of our comments and pay scant attention to the considerable sustainability and animal welfare issues that plague the pig rearing sector. The evidence is clear that the only way in which the EU's pigmeat sector can become sustainable and respect planetary boundaries is through a drastic reduction in the overall number of farmed pigs as well as in the density at which they are farmed. Industrial pig rearing raises considerable animal welfare issues, creates food-feed competition for arable land, drives the misuse of antibiotics which is causing the rise of antimicrobial resistance, and contributes to major air and water pollution which affects biodiversity, climate, and human health. Rather than a genuine reality check and transition pathway to align the sector with the goal of achieving a healthy and sustainable food system, this report unacceptably ignores the aforementioned threats and merely pushes for more destructive business-as-usual, focusing on end-of-pipe fixes such as biogas – despite evidence that biogas from pig slurry cannot make a valuable contribution to climate mitigation.

We therefore call upon the Agriculture and Fisheries Council to:

- Request the Commission to amend this report to integrate animal welfare and environmental concerns and chart a robust path for a just transition of the pig farming sector involving a strong reduction in the number of farmed pigs and a move away from intensive rearing systems which are detrimental to animal welfare, the environment, and human health;

For more information, see this [joint submission of the EEB and Compassion in World Farming](#) as part of the Pigmeat Reflection Group

Thank you in advance for your consideration of these points which support the ambitions of the European Green Deal and will help catalyse progress in meeting the environmental challenges facing Europe and the planet. I would also like to take this opportunity to request a meeting with you in the margins of the Council meeting on 20th March in order to discuss our input and recommendations.

Yours sincerely,



Patrick ten Brink
Secretary General, European Environmental Bureau (EEB)