To: Agriculture Ministers of EU Member States

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

Re: Input to the EU Agriculture and Fisheries Council Meeting, Brussels, 23 and 24 October 2023

Brussels, 19th October 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 23 and 24 October 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.

1. Waste Framework Directive – food related aspects

On 5 July the European Commission published a proposal for a targeted revision of the Waste Framework Directive (WFD). It proposes food waste reduction targets of 10 % for the processing and manufacturing stage, and 30 % for the combined stages of retail, restaurants, and households. With food waste in the EU at record levels, setting new targets for Member States to cut back on food waste is a step in the right direction. However, the proposal is not coherent with legislative developments and falls short of meeting climate goals, international commitments, and citizens' demands.

Therefore, we ***want to make the Agricultural and Fisheries Council aware that:***

- The proposed reduction targets are too low to cut absolute food waste amounts down to acceptable levels. The EU already in 2015 signed up to Sustainable Development Goal 12.3 which aims to halve food waste by 2030. The current proposal clearly does not meet this international obligation and fails to deliver on our global responsibility. The latest Global Sustainable Development Report 2023 once more highlights that particularly with regard to SDG 12.3, urgent action is needed now to achieve global targets by 2030.
- Over 50 civil society organisations support more ambitious targets and the Parliament has previously called for food waste to be halved from farm to fork.

- A significant share of food loss happens during primary production, which is currently excluded from the targets. However, this may create perverse incentives to push food waste onto primary production/farmers as this will not be counted in the achievements of the targets – particularly in view of unequal power relations with supermarkets and other powerful supply chain actors, whose policies are driving food waste on farms. This is also likely to result in economic costs for farmers, e.g., through food not harvested or harvested and then left on fields. The targets should therefore consider the entire value chain, from farm to fork, including the significant amount of food waste occurring at the primary production stage.
- The **Farm to Fork Strategy** includes a commitment to "halving per capita food waste at retail and consumer levels by 2030 (SDG Target 12.3)" and to setting a "baseline and propos[ing] legally binding targets to reduce food waste across the EU." It further states that the Commission will "investigate food losses at the production stage, and explore ways of preventing them."

2. Regulation on the certification of carbon removals

This Regulation has the opportunity to address both the environmental and climate crisis, while at the same time providing great benefits for farmers and ensuring that no one is left behind. Regrettably though, our analysis has found that instead of delivering these benefits, the proposal for the new **Carbon Removal Certification Framework (CRCF)** greatly undermines the EU's climate and environmental ambition, and **risks having disastrous consequences for our rural communities, climate, and nature.**

We therefore call upon the Agriculture and Fisheries Council to:

- Support the concerns raised by the Environment Ministers who should continue to lead the discussions on the proposal towards a strong Council position that will ensure a reliable and trustworthy certification framework;
- Prevent the proposal from establishing a greenwashing tool with no real climate action, and therefore reject the possibility of using the generated credits as offsets on voluntary carbon markets. Voluntary offsetting markets are not conceived to favour farmers and rural communities, and risk having disastrous implications on them due to liability issues and inadequate remuneration. Additionally, offsetting would constitute false pretence of climate action, greatly deterring the urgent emission reductions, as has been repeatedly shown at global level;
- Demand that ensuring highest levels of ecosystem integrity is included as a mandatory sustainability criterion for carbon removal activities. It is a scientific fact that improving ecosystem integrity should be regarded as a prerequisite for high-quality removals in the land sector, vastly increasing the resilience of our land to existing and expected future climate change and minimising the likelihood of the stored carbon to be released back into the atmosphere;
- Acknowledge that emission reduction efforts should take explicit priority in EU policy, and recognise that the reliance on removals will have a devastating impact on rural communities and climate, making the EU fall woefully short of reaching climate neutrality;

- Exclude emission reductions from this proposal and avoid sending the false signal, since emission reductions are fundamentally different to removals and should not be certified as such;
- Ensure that the CRCF will not allow the certification of activities that are environmentally, socially or economically unsafe, may not result in a net removal, or are impossible or prohibitively expensive to monitor, including soil organic carbon, bioenergy carbon capture and storage (BECCS), and carbon storage in products;

Thank you in advance for your consideration of these points which support the ambitions of the European Green Deal and will help Europe deliver on its climate and biodiversity commitments for the benefit of European people and businesses. I would welcome an opportunity to meet with you in the margins of the Council meeting on 23 and 24 October to discuss our input and recommendations.

Yours sincerely,

Patrick ten Brink,

Secretary General of the European Environmental Bureau

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