Civil society letter on the role of the EU Governance Regulation for agriculture

Brussels, 9 September 2026

Dear Ms. Slingenberg and Mr. Schellekens,

CC: Ms. Hanoune, Ms. Abreu Marques, Mr. Schilthuis,

EU agriculture can and must contribute to achieving the EU's climate objectives. Reducing the sector's environmental impact, reforming the food system, and protecting farmers requires a well-managed just transition pathway.

This year's revision of the EU Regulation on the Governance of the Energy Union and Climate Action (Regulation (EU) 2018/1999) provides a critical opportunity to make it fit for its purpose: supporting the planning, reporting, and monitoring required to drive climate action across all sectors, including the agri-food system.

We, the undersigned organisations, are writing to urge you to take the following recommendations into account for your proposal on the revision of the Governance Regulation.

1. Adopt a sectoral focus in the National Energy and Climate Plans (NECPs) that improves the planning and implementation of non-CO2 greenhouse gas (GHG) emission reductions in the agriculture sector

Having Paris Agreement aligned climate targets for the agriculture sector at EU and Member State level is necessary and consistent with the EU's whole-economy approach to climate change mitigation and its common approach to agricultural policy. Achieving climate neutrality will require counterbalancing residual emissions in the agricultural sector. Clarity on emission levels that are considered and accepted to be residual, and in line with the Paris Agreement, is needed to allow for adequate planning.

Many EU countries have already set 2030 emission reduction targets for agriculture, including under their national climate laws or NECPs. Yet, the EU's agricultural GHG emissions are not expected to decrease significantly by 2030 or even 2040, demonstrating that there is a need for both stronger targets and a coherent planning and enforcement process to achieve them. This should be complemented by EU and national sectoral roadmaps, preferably towards national targets Member States have identified as part of their national legislation and/or NECPs. Strengthening the Governance Framework to better plan and track climate action in the sector towards such a target, complementing its current 5 dimensions, is a necessary improvement.

2. Mandate reporting on KPIs reflecting the status of transition in the agriculture sector

Reporting on the status of climate action in the EU should be accessible and meaningful. While the annual tracking of GHG emission reductions through the national inventories is fundamental to guarantee compliance towards national and EU-wide climate targets, reporting on additional Key Performance Indicators (KPIs) can help to show progress on key drivers for implementation – for the agriculture sector, particularly on methane and nitrous oxide emissions. We therefore recommend requiring Member States to report on a set of KPIs for the agri-food sector as part of their progress reports to NECP implementation, and not as a mechanism for Member States to gain access to flexibilities in achieving GHG emission reduction targets.

The KPIs should constitute important levers in the transition to an agroecological EU. Activities and metrics related to the performance of intensive industrial systems, i.e. focused on GHG emissions intensity, should not be at the center as they have limited mitigation potential, entail risks for **animals** and **people**, **delay the transition**, and do not reflect the actual global warming impact of the sector. KPIs should include, but not be limited to:

- *Synthetic fertiliser use:* The dependence of the EU food system on mineral fertiliser adds significantly to the EU's agrifood GHG emissions, while harming its resilience and public health. Nutrient pollution of water and air costs the EU an estimated €70-320 billion annually and the dependence on imported energy and products makes the system vulnerable to geopolitical disruptions that challenge the functioning of the current agricultural model.
- *Animal-sourced food consumption:* Governments should actively invest in food environments that enable EU consumers to adopt a healthier, plant-rich diet. This holds a great potential to not only reduce the climate and environmental footprint of diets but also to improve public health and food autonomy. This KPI can also build on the indicator that the Commission already tracks in its Climate Neutrality Dashboard.
- *Feed autonomy:* Member States need to transition their farmed animal systems to a level that the local area can support, is consistent with the EU's climate targets, and reduces the burden of the EU agricultural production system on other countries. Currently, however, the EU is a net importer of calories, proteins and land. The European Scientific Advisory Board on Climate Change (ESABCC) recently highlighted the risk of the EU's dependence on imports of these protein crops from supply chains vulnerable to climate-related disruptions. The EU already tracks feed autonomy, and Member States like Germany have adopted this approach at the national level.

3. Track the phase-out of climate-harmful subsidies and the provision of just transition support

The EU has recognised that phasing out fossil fuel subsidies is fundamental to achieving its climate goals. This insight should be expanded to a broader scope of financing. The ESABCC categorises untargeted hectare-based payments, as well as coupled payments for livestock in the Common Agricultural Policy as climate-harmful subsidies. Rather than untargeted financing, public funds should support activities and systems, including agroecological livestock systems and organic farming, that generate broader societal benefits, and support a just transition for farmers. At the same time, it is essential that the market enables farmers to receive fair prices, above cost of production.

While the reform of agricultural subsidies is not within the scope of the Governance Framework, it can play a role in identifying and tracking progress towards this shift in spending. We recommend that the Commission develops reporting measures that cover the phase-out of climate-harmful subsidies, beyond fossil fuels, as well as Member State investment in the transition.

The revision of the Governance Regulation is a key opportunity to set the EU's agri-food system on the path towards a system that is healthier for people, animals, and the planet. Restructuring reporting around a sector-based model provides the farm community with a long-term perspective, while tracking progress towards reducing synthetic fertiliser use, a shift in diets, and enhancing feed autonomy can help focus public policy and ensure public investments are effective.

The next iteration of NECPs should include

- sectoral pathway chapters, including a chapter dedicated to meaningful climate action in the agriculture sector, along with the 5 dimensions of the EU Energy Union
- a sectoral pathway for Paris-aligned GHG emission reductions in the sector, broken down by greenhouse gas, in particular methane and nitrous oxide
- quantification of the GHG emission reduction potential of all policies and measures, including those meant to drive climate action in agriculture
- KPIs to track key drivers for the transition to agroecology
- dedicated budgets and expenditure tracking for the proposed mitigation measures

We would welcome the opportunity to present and discuss our recommendations in a meeting and remain at your disposal for any questions.

Yours sincerly,
The undersigned