

FIT FOR FARMING

**The Role of Agriculture in
EU Climate Policy Post 2030**



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Key demands

1. Design the EU's climate policy framework for at least 90% domestic net greenhouse gas emission reductions by 2040 (1990 baseline) and aim for climate neutrality. Plan for negative emissions thereafter.
2. Set binding, separate targets at EU and national level for emission reductions in each sector, carbon sequestration in ecosystems, and permanent carbon removals.
3. Improve the implementation and enforcement of policies such as the Governance, Effort Sharing, and LULUCF Regulations to ensure targets are met.
4. Do not resort to 'flexibilities' that undermine climate action and delay necessary transitions.
5. Set a dedicated binding gross emission reduction target of at least 30% by 2040 (2015 baseline) for methane and nitrous oxide emissions from agriculture.
6. Set a LULUCF target for all EU peatlands to be CO₂ neutral by 2040 and climate neutral by 2050, in addition to the overarching LULUCF target.
7. Accompany emission targets with sectoral roadmaps setting out the transition pathway, including measures and funding needs and sources. For agriculture, a roadmap towards an agroecological EU should identify how to bring the sector within the ecological carrying capacity at regional level, achieve strategic self-reliance and resilience, and restore degraded agro-ecosystems.
8. Solve methodological issues in the CRCF Carbon Farming Delegated Act that undermine its effectiveness, quality, and credibility. Align the methodologies with best practices already established under the Paris Agreement Crediting Mechanism and other schemes.
9. Implement enabling policies for climate action in agriculture: phase out harmful subsidies and apply the Polluter Pays Principle through emission pricing.
10. Design demand-side objectives and policies to reduce the EU's consumption footprint.

INTRODUCTION

Climate change is very real, and it is increasingly felt. Its consequences are putting us all at risk, and our actions to limit the damages matter. With much of the EU's climate legislation up for revision, it is safe to say: this is a crucial moment for climate action.

In March 2026, the EU set a target for 90% net greenhouse gas (GHG) emission reduction by 2040. Even though it represents the lower bound of a science-based and Paris Agreement-compliant objective (if fully achieved domestically)¹, it will require large emission cuts over the next decade and a half.

While the EU claims to stay the course on achieving climate neutrality, progress is too slow, and the political context has shifted.² Tackling climate change and protecting the environment were top priorities on the political agenda when the EU Green Deal was launched in 2019. Today, the green transition has been slowed and risks being derailed by actors who erroneously and often maliciously pit it against the idea of a competitive and secure Europe. For EU citizens, however, tackling the climate crisis remains a key concern.³ It is in this challenging context, that policy makers need to design the set of instruments that will stabilise our climate and restore our environment from 2030 onwards.

Achieving the 2040 target and climate neutrality will require minimising the climate impact of all Member States and all sectors of the economy. Therefore, the European Commission's search for "flexibilities"⁴ in an attempt to make climate action palatable to some conservative politicians and industry actors is misguided. This

energy should rather be spent on developing effective and fair measures to reach ambitious and science-based climate, environmental, and social objectives.

Agriculture is a sector with significant emissions that is lagging on both climate mitigation and adaptation. Deep emission reductions in the agri-food sector are possible, and indispensable to reach climate neutrality.^{5,6,7}

Besides being a significant contributor to climate breakdown, our current agricultural system and land use is a major pressure on many of the planetary boundaries.⁸ In the EU, two thirds of agricultural soils are degraded⁹, 80% of marine water and a third of our rivers and coastal waters are eutrophic¹⁰, biodiversity is in free fall¹¹, our environment and our bodies are full of pesticides¹², and land carbon sinks are declining¹³. All this, while the agricultural sector is among the first to experience the whiplash of a changed climate and an exhausted environment, losing yields, revenues, and perspective.

Through a shift in what and how we produce and consume, reducing the climate impact of agriculture can offer many synergies, resolving wider issues caused by our current agri-food system.¹⁴ It can reduce resource and land use as well as chemical and nutrient pollution, build resilience and strategic self-reliance¹⁵, and improve animal welfare. If we do not change our food systems, climate breakdown and environmental degradation will change them for us. A transition is inevitable, but making it just and sustainable requires action now. It is time for policymaking to ensure that farming is fit for the future, and the future fit for farming.



THE UNTAPPED POTENTIAL OF CLIMATE ACTION IN AGRICULTURE

Direct EU agricultural GHG emissions make up around 11% of total EU GHG emissions (not including fossil fuel use, the production of fertilisers, or the embedded emissions from imported products). Over the past two decades little progress has been made to mitigate them, and with current and planned measures, we are looking at a decrease of a few percentage points over the next 15 years.¹⁶ This is nowhere near the reductions needed to get the agricultural sector on the trajectory to a climate neutral EU by 2050. In addition, peatland drainage accounts for another 5% of total EU emissions.¹⁷ Since they are mostly drained to allow for agricultural production, these emissions are very much agricultural emissions too.

Coming predominantly from animal farming (methane and nitrous oxide), fertiliser use (nitrous oxide), and the drainage of organic soils (carbon dioxide), agricultural emissions are biogenic and diffuse, as they stem from biological processes and are emitted by geographically dispersed operations. Some level of emissions is also inevitable – as long as we farm ruminants, they will emit methane. Too often, these facts are misused by industry players and lobby groups to argue that agricultural emissions are difficult or even impossible to mitigate. The reality, however, is that these emissions are, to a large extent, the result of decisions made in the food system, hence they are, to an equally large extent, avoidable. Moreover, methane and nitrous oxide are “super pollutants”. Reducing

these emissions constitutes an important lever in the fight against climate breakdown as well as environmental pollution, making it a very effective and high-reward solution with economic and human health benefits.¹⁸ As well as causing harmful air pollution, methane is a very potent GHG in the near term, making it a suitable target for action with quick significant results, while reducing nitrous oxide is also a high impact action given its high warming potential and atmospheric lifetime of over a century.

A review of climate mitigation scenarios and modelling shows that EU agricultural emissions can be reduced significantly.¹⁹ To which extent they can be reduced – i.e. what level can be considered ‘residual’ – depends not only on what is technically feasible, but also what is considered economically viable, politically acceptable, and societally desirable. The disparity in the technical assumptions around mitigation measures and normative choices, such as whether to factor in dietary shift or extensification, result in combined emission reduction potential estimations for animal farming and fertiliser use ranging from 25% to 59% compared to 2023 emission levels. Scenarios that combine the most significant mitigation measure – reduced animal protein consumption – alongside the deployment of mitigation technologies, show the most ambitious levels of emission reductions.²⁰ Nevertheless, modelling that does not implement any technical mitigation

technology, but instead focuses on a large-scale transition to agroecology in a system without synthetic inputs while being self-sufficient in protein and meeting the EU's nutritional needs, still reaches a 44% emission reduction.²¹ Relying exclusively on technical solutions not only limits the mitigation potential, but also fails to address other environmental impacts of the agriculture sector. It risks locking in production systems that are inherently unsustainable and problematic, and leading to maladaptation. Such narrow approaches must therefore be avoided, and instead the agriculture sector must be supported through a systemic and fair transition.

The Commission's impact assessment for the 2040 climate target communication models a minimum of 30% reduction in agricultural non-CO₂ emissions (UNFCCC category 3) relative to 2015 levels to reach the EU's 90% target. The impact assessment's LIFE scenario, however, indicates that with changes that go beyond technical measures, such as a dietary shift, the associated reduction in farmed animal numbers, and a reduction in the use of synthetic fertiliser,

emissions can be cut by nearly 50%.²² From that, we can conclude that 30% by 2040 is the absolute minimum target that needs to be set.

Farmers all over Europe are demonstrating nature-friendly farming works. There need not be trade-offs between improving the health of our environment, the stability of our climate, the wellbeing of our animals, and the prosperity of our farmers and consumers. We can feed Europe with healthy and sustainable food and build a circular bioeconomy, all while drastically reducing our negative impact on the environment and the climate. This includes the impacts generated outside of the EU, which currently are vast. The EU imports a lot of agricultural commodities from elsewhere, without accounting for their impacts on the environment in which they are produced, or their embedded emissions (150 MtCO₂e in 2023).^{23,24} A transition to agroecology and changing our consumption patterns will allow us to break free from dependencies while mitigating climate change without risking displacing emissions.

Policy demands

1. Make agriculture part of the climate transition by setting a dedicated binding gross emission reduction target of at least 30% by 2040 (2015 baseline) for methane and nitrous oxide emissions from the sector.
2. Accompany emission targets with sectoral roadmaps setting out the transition pathway, including measures and funding needs and sources. For agriculture, the roadmaps should identify how to bring the sector within the ecological carrying capacity at regional level, achieve strategic self-reliance and resilience, and restore degraded agro-ecosystems.
3. Ensure climate action in agriculture is carried by a transition to agroecology which offers wider benefits. Make climate mitigation in the land sector work in synergy with adaptation and build resilience by advancing nature restoration and protection. The choice of practices, tools, and technologies should be carefully assessed against these considerations.
4. Design policy to enable food environments that favour healthy and sustainable diets.
5. Put in place objectives and policies to reduce the EU's consumption footprint. As a major importer, including of agricultural commodities, the EU is responsible for a share of emissions taking place in third countries.

A CLIMATE POLICY ARCHITECTURE THAT DELIVERS

Despite decades of EU policymaking on climate and agriculture, we still lack a robust policy framework to bring down agricultural emissions and transition the sector towards sustainability.²⁵ While much of the current focus is on creating incentives and shaping business models, climate inaction in agriculture is a regulation and enforcement issue.

The Effort Sharing Regulation (ESR) covers agriculture, along with domestic transport (excluding aviation), buildings, small industry, and waste, together representing two thirds of total EU emissions. Member States have binding targets which together will result in a 40% ESR emission reduction at EU level by 2030 (2005 baseline), but no sectoral sub targets, meaning they can pick where to mitigate emissions. So far, it has been anywhere but in agriculture. Another element contributing to the lack of action are the flexibilities between Member States and sectors. The possibility for countries and sectors

to sell surpluses to others, for example in carbon sequestration in forests under the land use, land use change, and forestry (LULUCF) Regulation, lets laggards compensate for their shortfall and blurs the lines between temporary carbon sequestration and emission reductions.

The revision of the EU climate architecture for the post-2030 period is an opportunity to set a number of things right. Maintaining a robust framework at EU level, based on binding targets, strong accountability, transparent governance, and translated into clear responsibilities for Member States is key. The updated climate policy package must learn from today's stumbling blocks and improve on the current structure rather than devolving responsibilities to Member States and introducing flexibilities that lower accountability. Overhauling decades of policymaking will not change the fact that the transition needs to take place regardless.

SETTING ADEQUATE CLIMATE TARGETS

Following the agreement on the EU-level 90% net emission reduction target, it is necessary to distinguish between different types of climate action and divide the efforts among Member States on the one hand, and sectors on the other hand. First, since the 90% target is a net target, the EU still needs to clarify how emission reductions, carbon sequestration in ecosystems,

and permanent removals will each contribute to the achievement of the target. It is crucial to keep them as separate objectives, as they each have a role to play and cannot substitute each other.

Next, establishing binding targets that pin down the needed contributions per country

and per sector is a logical and necessary step to ensure the whole EU economy is in line with overall climate objectives and sectors can plan accordingly. These targets will need to be allocated, taking into account a country's Gross Domestic Product (GDP), historical emissions, cost-effectiveness, and, in the case of land use related targets, land area and environmental and climatic conditions.

It will be important to have clear perspective and transparency on residual emissions. Hence, the EU should develop a residual emissions strategy encompassing all sectors, to avoid emissions being mislabelled as residual on purely political grounds. What is deemed residual can also be subject to change, in line with technological developments and evolving societal needs. This means that the EU planning for residual emissions also needs to be reassessed regularly.

The idea of establishing economy-wide national targets is receiving some traction in policy discussions.²⁶ Having economy-wide

targets without mandatory sectoral targets, however, will run into the same problem as the current architecture. An economy-wide target requires economy-wide action. Logical, but not always reality, as demonstrated by the current ESR sectors moving at different speeds. EU-level decisions remain necessary, as national economy-wide targets will make climate action in agriculture a fight that needs to be fought in every individual Member State, where governments are pressured by agro-industrial lobbies. Adding sectoral targets to the ESR would solve this issue.

Another concept that has entered policy discussions is that of “two-tier targets” made up of a mandatory core target and on top of that an aspirational target.²⁷ Any target constitutes the minimum that needs to be achieved, and never prevents going beyond it. Therefore, binding targets need to be ambitious, while aspirational targets risk being empty shells that have no place in climate legislation.

LIMITING FLEXIBILITIES

Any use of flexibility will be compensating for a shortfall elsewhere, thus slowing down action in a certain area. Some flexibilities would even harm overall mitigation outcomes. The Commission's public consultation survey presented the idea that a set of Key Performance Indicators (KPIs) could be used as indicators

to allow Member States to access flexibilities. However, flexibilities should be kept to a strict minimum and serve as a last resort option to be accessed in case of exceptional circumstances, not a default alternative to reaching mitigation goals.

INTERNATIONAL CREDITS

International credits undermine mitigation efforts at home and abroad, thus benefitting no one in the long term. Their use is likely to further delay emission reductions in the EU that require larger transformations, such as those in the agricultural sector, by taking off the pressure and diverting budgets. The benefit of supporting third countries' mitigation efforts is thus offset by a reduction of efforts in the EU. Abroad, the international credits risk claiming

benefits from low-hanging fruit efforts that would have counted towards the third country's own mitigation actions. The negative effect on climate action and the wider risks related to the integrity and governance of international credits means their use should not be considered.²⁸ Consequently, the EU climate target of 90% net emission reduction and its implementing package should be domestic.²⁹

The inclusion of up to 5% international credits as a flexibility mechanism risks becoming a target in and of itself. Therefore, to minimise their negative impact, it is essential to ensure Member States can only access the credits in case of emergency, under strict conditions, and after appropriate justification and impact assessment. The purchase of international credits should be organised at the EU level to ensure a consistent approach and quality criteria beyond current standards, but the budget should come from the national government that requests the purchase to meet their target. This way, Member States have the incentive to meet their targets domestically and cannot rely on EU money to finance their lack of climate action. Requiring that all countries involved are already taking Paris Agreement-aligned action without factoring in international credits is a prerequisite to ensuring the absence of mitigation deterrence.

By no means should international credits be considered international climate finance, or substitute the EU's contribution thereto. While climate finance for third countries is an important part of equitable climate action that should be increased, it should be done in addition to, not instead of adequate domestic action.

EMISSION TRADING BETWEEN SECTORS AND MEMBER STATES

Trading of climate achievements between sectors and Member States de facto means that someone has not been doing their job well enough, which is something we cannot afford. Therefore, there should be strict requirements with transparent reporting at EU level tied to the use of such flexibility.

If any trading is allowed, it will be crucial to maintain the separation between the different types of mitigation actions: emission reductions, sequestration in ecosystems, and permanent removals to ensure the EU's overall mitigation outcome is not affected. The current flexibility between the LULUCF and ESR sectors violates this principle. Moreover, the fact that under

the revised Climate Law the LULUCF sector is allowed make up for shortfalls in ESR sectors, while ESR sectors are not obliged to compensate for LULUCF shortfalls again shows how flexibilities are the instruments of a lacking ambition that imperils the EU's climate action.

COMPLIANCE

Annual compliance is the best guarantee for keeping Member States on track. Extending this period to cover multiple years or to the final year of the compliance period, as is being considered, will delay action, resulting in a higher accumulation of GHGs in the atmosphere.

PLANNING AND IMPLEMENTATION

Under the EU Governance Regulation, Member States are required to make ten-year National Energy and Climate Plans (NECPs) which should detail how all economic sectors will mitigate their emissions, and 30-year Long-Term Strategies, report on emissions data on an annual basis, and on progress on climate policies every two years. However, the ESR sectors are often the weakest part of the NECPs, lagging on action³⁰, and lacking timelines, quantification of impact, and dedicated budgets.³¹ Agriculture in particular tends to remain poorly addressed, with countries considering emission reductions in the sector difficult to achieve in a “cost effective and competitively neutral way” and without “draconic” measures, and the Commission’s feedback providing little impetus for that attitude to change.³² This shows that the current policy framework does not deliver sufficiently: even where enabling policy requirements already exist, results are not always being achieved.

It is essential that, in the review of the Governance Regulation, steps are taken to ensure that Member States plan mitigation measures and allocate corresponding budgets for all sectors in their NECPs. Sectoral roadmaps should be developed to create perspective and investment security with a consistent approach towards the objectives. Cost-effectiveness should not be the main guiding principle, as it will limit the options that are considered and risk falling short of system transformations. Nevertheless, cost-effectiveness should speak in favour of tackling agricultural emissions, as a significant portion of

non-CO₂ emissions is abatable at relatively low marginal abatement costs.³³

Better enforcement mechanisms will be needed in the next term to ensure lagging Member States correct course. The current measures such as the penalty multiplier for delayed emission reduction, and the requirement to submit corrective action plans should be maintained. Additional enforcement mechanisms, such as certain funding under the Multiannual Financial Framework (MFF) being contingent on meeting a set of quality criteria, can also be designed to ensure timely and proper implementation.

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 remains fundamental to guarantee compliance towards national and EU-wide climate targets, reporting on additional KPIs can help to show progress on key drivers for implementation. This could be of particular relevance for the agri-food sector, where the transition includes many potential indicators related to health and environment. We therefore recommend requiring Member States to report on a set of KPIs, including for the agri-food sector, as part of their progress reports.³⁴ Importantly, as mentioned above, KPIs should not serve as a mechanism for Member States to gain access to flexibilities interfering with their GHG emission reduction targets.

STRENGTHENING THE LAND SINK

The LULUCF Regulation is under a lot of pressure as Member States are set to fail to meet its targets. However, in the face of a decreasing land carbon sink within a context of wider environmental degradation and extreme pressures, there is no room for lowering ambition.

The LULUCF framework post 2030 should reduce land-use emissions, while protecting and restoring EU land sinks. A binding and ambitious LULUCF target is needed. Investing in resilient forests and ecosystems through nature restoration is critical not only for climate action, but also for adaptation, as healthy, diverse forests are more resistant to fire and lessen the severity of fire in surrounding areas, while restored wetlands are better able to retain water in extreme droughts.³⁵ Reducing the pressure from harvesting is also key, as wood harvesting is by far the main driver of biomass loss in the EU.³⁶

Today, the EU's peatlands are an outsized emission source, on a very limited share of land area. If restored, their CO₂ emissions can practically be eliminated, while providing important wider benefits. Peatland emissions are accounted for under LULUCF, so to tackle all significant emission categories linked to agriculture, this policy should set, in addition to

the overarching LULUCF target, a binding target to make all EU peatlands CO₂ neutral by 2040 and climate neutral by 2050 through rewetting and restoration.

The transition to a bioeconomy offers certain sectors a helpful pathway to decarbonisation. However, this transition needs to happen in a responsible way that acknowledges the biophysical limits of ecosystems and the drawbacks of heavily managed environments. Without appropriate safeguards, a bioeconomy at scale will contribute to increased emissions and the overexploitation of ecosystems with consequences such as biodiversity loss and soil degradation. With the current pressures already exceeding many ecosystems' carrying capacity, it is clear that biobased inputs cannot sustainably replace fossil carbon inputs on a 1-to-1 basis.³⁷ Therefore, even if feedstocks become more sustainable, demand reduction remains key.

Over the years, some have argued for reforming LULUCF into an AFOLU pillar, including non-CO₂ emissions from agriculture. We advise keeping them separate to avoid blurring the lines between the specific action needed on both sides to mitigate climate change.

Policy demands

1. Design the EU's climate policy framework for at least 90% domestic net emission reductions (1990 baseline) and aiming for climate neutrality by 2040, negative emissions thereafter.
2. Set binding overarching and sectoral targets at EU and national level for emission reductions, sequestration in ecosystems, and permanent removals, recognising that they cannot substitute each other.
3. Build on the existing legislative framework by improving the effectiveness of the ESR and LULUCF regulations. Keep agricultural emissions out of LULUCF.
4. Set national sectoral targets that are compliant with EU climate targets based on a combination of a country's GDP/capita, historical emissions, and cost-effectiveness, and in the case of land use related targets, land size and type as well as environmental and climatic conditions.
5. Develop a clear and evidence-based EU residual emissions strategy encompassing all sectors, to avoid emissions being mislabelled as residual.
6. Do not resort to flexibilities that undermine climate action and delay necessary transitions. Do not allow for international credits to count towards EU mitigation results, and limit the use of other flexibilities by imposing strict conditions.
7. Improve the implementation and enforcement of policies such as the Governance and LULUCF Regulations to facilitate planning and monitoring, ensuring targets are met. Add KPIs to track progress on key levers in the agri-food system.
8. Set a LULUCF target for all EU peatlands to be CO₂ neutral by 2040 and climate neutral by 2050, in addition to the overarching LULUCF target. This requires rewetting and restoring all peatlands.
9. Carefully plan the development of the bioeconomy so it does not lead to the further degradation of our natural environment. Demand reduction is key.



TOOLS FOR THE TRANSITION

Meeting targets requires the right instruments. For climate and agriculture, the EU is well-placed to provide these in the context of the internal market for agriculture and food, where a common vision and a level playing field are critical. However, currently none of the emission pricing schemes in the EU cover agriculture, failing to apply the Polluter Pays Principle (PPP), and making it one of the few sectors not covered by emission pricing. At the same time,

the Common Agricultural Policy (CAP), the main driver of agricultural activities in the EU, has a poor track record on mitigating climate change.³⁸ Decades of inaction in agriculture and successes in other sectors tell an important lesson: incentives and green business models can only take us so far. Regulation, emissions pricing, enforcement, and policy alignment are needed to tip the needle.

CERTIFYING CLIMATE ACTION IN LAND USE AND AGRICULTURE

The Carbon Removals and Carbon Farming (CRCF) Regulation aims inter alia to support climate action in the land sector. In July 2026, the Commission adopted three certification methodologies for carbon farming under this Regulation. They lay out monitoring, reporting, and verification (MRV) requirements to certify “units” of carbon sequestration and emission reduction from sustainable agricultural practices on mineral soils (including agroforestry), peatland rewetting, and afforestation.³⁹

The CRCF was originally presented as a voluntary mechanism to strengthen the business case for carbon farming and carbon removals, but its potential role has expanded significantly since. It is now expected to play a central role in post-2030 EU climate policy. This is highly concerning for multiple reasons.

First, many methodological issues undermine the robustness and integrity of this framework, such as the likely overestimation of benefits in the context of high uncertainty, the questionable permanence and additionality of climate impacts, the lack of operable sustainability criteria and social safeguards, and the framework’s failure to respect best practices established under existing voluntary carbon market schemes and the Paris Agreement Crediting Mechanism.⁴⁰ These shortcomings risk causing a mismatch between what is claimed and what is real, translating in real-world threats to climate and environmental action in the EU.

Second, the CRCF carbon farming units will be generated and purchased on a voluntary basis. Its voluntary nature and focus on incentives may make it attractive and explain its appearance across policy areas and several plans and

strategies, including the Fertiliser Action Plan, the Livestock Strategy, the Roadmap towards Nature Credits, and the Bioeconomy Strategy. However, the dire state of the EU land sink and food system despite decades of voluntary initiatives is a solid predictor of the CRCF being ineffective at scale. Even if a certain level of voluntary demand could be generated, for example through the Commission's "Buyers' Club" initiative⁴¹, it will not fund the transformative change the EU agri-food and land sectors need.⁴² Indeed, the activities that can be funded by the CRCF are constrained by the objective, logic, and mechanisms of carbon markets and corporate business models. In offsetting markets, companies will favour price over quality and offset their emissions rather than reduce them.⁴³ Inside the value chain, the majority of companies will not, on a voluntary basis, implement changes that challenge their current business models.

Last but not least, rewarding polluters for reducing emissions is at odds with the Polluter Pays Principle, which requires polluters to bear the cost of reducing, preventing, and cleaning up the environmental damage they cause.⁴⁴ Yet, that is precisely what the CRCF carbon farming methodology is set to enable, for example by allowing the generation of units for a reduction in nitrous oxide emissions from fertiliser use to be funded by any private or public budget. Expanding this to methane emissions from animal farming, by adding them to the scope of the CRCF Regulation, would therefore be highly problematic. This issue may to some extent be mitigated by one of the options on the table for the revision of the CRCF Regulation which would limit the use of units to private actors inside the value chain.

The Commission is considering making a parallel 'statement of performance' track under the CRCF for certifying units that can only be used by agri-food companies to demonstrate emission reductions or carbon sequestration in their value chain, and not to generate units that can be sold and traded on the voluntary

carbon market. The rationale is that robust and harmonised quantification of livestock emission reductions at EU level could support and incentivise food companies and retailers to act on and invest in on-farm emission mitigation within their value chain to reduce their scope 3 emissions. Such a system presents lower risks, as long as the methodology meets high standards, emission reductions are not publicly funded, and certification incentivises the right type of action.

Unfortunately, the approach set out by the most recent draft pilot methodology for livestock emission reductions fails to drive the transition towards healthier animal farming. In this narrow framework, certifiable activities are limited to technical solutions related to interventions on feed and manure, while extensification of production towards animal farming with herd sizes compatible with their local environment cannot be supported. This means that the CRCF can only benefit intensive animal farming systems, which will be able to capitalise on the lowering of their emissions while maintaining unsustainable levels of production, and could potentially incentivise further intensification. This flies in the face of overwhelming evidence demonstrating the need to reduce animal numbers in regions with a high density of farmed animals and the associated air, soil and water pollution, and animal welfare issues caused by industrial rearing systems.

In short, the CRCF, in its current form – allowing offsetting as well as the use of public money, a selection of certifiable activities that will bolster further intensification, and the excessive leniency granted in the quantification approaches of other carbon farming methodologies that will likely affect also the methodology on livestock emission reductions – is not a suitable policy instrument to address GHG emissions from animal farming. Moreover, without binding climate targets, or emission pricing for the sector, the mere existence of a certification framework is unlikely to enable action at scale.

PRICING EMISSIONS

Voluntary action is insufficient to future-proof our land and agricultural systems, and rewarding pollution goes against basic EU environmental law and fairness principles. Pricing emissions is the way the EU applies the Polluter Pays Principle to GHGs from most sectors, but not the land and agriculture sectors.⁴⁵ The idea of pricing emissions from agriculture is not a new one. It has been suggested by the European Court of Auditors^{46,47}, investigated by the Commission⁴⁸, and recommended by the European Scientific Advisory Board on Climate Change (ESABCC)⁴⁹.

Together with setting binding targets for countries and sectors, emission pricing can be part of the answer. A single EU country, Denmark, has gone ahead and agreed on a national level tax that implements partial pricing for emissions from animal farming as part of a wider action plan on tackling externalities in the land and agriculture sectors, showing that the hesitance at EU level is political rather than practical. In its Action Plan for resilience, strategic autonomy, and sustainability of the EU protein system, the Commission highlights the role of national demand-side policy tools as taxation to make diets healthier and more sustainable.⁵⁰ At the EU level, implementing taxation would be challenging, but pricing emissions through an Emissions Trading System (ETS) could equally act as a price signal to shift towards more sustainable production and consumption. The public revenues generated through emission pricing should be invested in the transition of the sector.

As laid out in our 2024 position paper on the matter⁵¹, the EEB supports the establishment of an Agri ETS to address animal farming emissions. Emissions from fertiliser use, fossil fuel use, and drained peatlands would be best tackled through existing systems. Following an extended producer responsibility logic, the emissions from fertiliser use could be covered under ETS1, which currently already covers the emissions from their production. The fossil fuel emissions from machinery use in agriculture, can be covered by an expansion of the scope of ETS2 at national level, as already done in several Member States.⁵² Emissions from drained peatlands, on the other hand, should be tackled by banning the drainage of organic soils and rewetting obligations on Member States.

Besides the obvious need for an appropriate cap on emissions, an ambitious linear reduction factor, and a fair use of revenues as key design principles in an ETS, the caveat with applying emissions pricing to agriculture is that it needs to be implemented with the right surrounding policy mix. In isolation and without safeguards, it is likely to drive further intensification and penalise activities that are sustainable due to their appropriate scale and the practices they implement, but that have fewer technical GHG mitigation options. Emission intensity, a common metric reflecting productivity gains versus emissions, is not a sufficient indicator for climate action. The atmosphere does not care how many litres of milk are produced, it cares about the total amount of emissions.

FIXING AGRICULTURAL SUBSIDIES

Policy coherence is essential. While climate policy can be designed to enable change in the agricultural sector, agricultural policy needs to be aligned with the EU's environmental and climate objectives. Unfortunately, even in recent times, this has not been the case (see Box 1). The CAP is the largest stand-alone budget at EU level and has a long history of supporting intensive agricultural systems. Its focus on yield and scale has led the EU's agricultural sector to evolve in a direction that can no longer be socially or environmentally sustained.⁵³ Today, the CAP supports intensive high-input animal and crop production, including on drained peatlands. It has too little consideration for the implications for the environment and the climate, despite incremental changes over several reforms, and listing them as key objectives. A telling example is the weakness of the incentive the policy creates for protein diversification. While a protein shift is recognised as a key intervention in making the agri-food system healthier and more sustainable, in 2020, the CAP subsidies for beef and lamb were estimated at 580 times the support for legumes.⁵⁴

As negotiations on the next CAP (2028-2034) take place, it is crucial to recognise and act on the fact that, when it comes to agriculture, these public subsidies are the main lever to shift production and farm practices, and hence improve the environmental and climate performance of EU agriculture. The EU has recognised that phasing out fossil fuel subsidies is fundamental in achieving its climate goals. This approach should now be expanded to include harmful subsidies under the CAP – such as coupled payments for intensive animal farming or investment support for intensive rearing infrastructure without adequate safeguards. Furthermore, rather than spending the bulk of the CAP budget on untargeted hectare-based payments that disproportionately favour the largest farms⁵⁵ and line the pockets of billionaires^{56,57}, public funds should support farmers who are delivering environmental and societal benefits, e.g. through agroecological farming or paludiculture on restored peatlands, and support a just transition for those whose business models require fundamental change.^{58,59,60}

BOX 1

Aligning agricultural policy with climate and environmental objectives?

While the EU's Vision for Agriculture and Food⁶¹ made high-level statements recognising the pressures of the agri-food sector on the environment and the climate, as well as farming's dependence on nature, EU agricultural policy developments say something else. The EU's Livestock Strategy, Fertiliser Action Plan, and revision of the Nitrates Directive are just a few recent examples of the Commission's response to pressing agricultural issues concerning the two main GHG emission sources in EU agriculture. They could have been catalysts to tackle EU agriculture's climate issue at its roots. Unfortunately, in all cases, the result is business-as-usual or even regressing, set to leave us in a similar situation when the next crisis hits.

Livestock Strategy

Instead of recognising methane emission reductions as a key lever in the fight against climate change and committing to acting accordingly, the Commission used the Strategy⁶² to float an industry narrative downplaying the impacts of methane from animal farming. Far from setting the sector on a certain path towards a resilient and climate-safe future, the Commission counts on technical measures and voluntary action through the CRCF to reduce emissions without tackling the wider issues of intensive animal rearing. With vague aspirations, industry narratives, and an operating license for business-as-usual in the industrial animal farming sector, the Strategy leaves the EU without a clear plan for delivering on its climate, air, and water quality, animal welfare and rural development goals.

Fertiliser Action Plan

When geopolitical turmoil once again made the case for building a food system that is not dependent on inputs from third countries, the Commission had an opportunity to use the momentum for transformation towards a food and farming system that farms with nature rather than with high-emitting and polluting synthetic inputs. Yet, the focus of the Commission's response⁶³ was on ensuring accessibility and affordability, prioritising securing new markets and domestic production capacity rather than supporting farmers to become less dependent on fertilisers by restoring the natural productivity of agricultural ecosystems, which would deliver substantial cuts in nitrous oxide emissions.

Nitrates Directive

The most recent fertiliser crisis has also been abused by Agri lobbies to push for higher limits for manure application under the EU's Nitrates Directive⁶⁴. Rather than weakening environmental regulation to fit business practices, businesses should evolve to respect the physical limitations of our natural systems. In a context where fields and waterbodies are already oversaturated with nitrogen, applying more of it only causes more harm. Seemingly disregarding its own climate objectives, the state of its environment, and scientific knowledge, the Commission already allowed additional nitrogen from processed manure to be applied in sensitive areas through the RENURE amendment to the Nitrates Directive⁶⁵, which it now seeks to expand to digestate.



Policy demands

1. Solve methodological issues in the CRCF Carbon Farming Delegated Act that undermine its effectiveness, quality, and credibility.
2. Align the CRCF methodologies with best practices already established under the Paris Agreement Crediting Mechanism and other schemes.
3. Ensure that activities under future carbon farming methodologies, such as improved forest management, incentivise activities that are aligned with a transition towards agroecological systems that, besides mitigating climate change, also improve resilience and input independence, and reduce pollution and environmental degradation.
4. Make the inclusion of livestock emission reduction in the CRCF contingent on the limitation of the use case to value chain scope 3 reporting, and the incentivisation of extensification of production and reduction of animal numbers.
5. Implement the Polluter Pays Principle in the agricultural sector by pricing its greenhouse gas emissions. Install appropriate safeguards and flanking measures to ensure climate action is nature friendly.
6. Align all agricultural policies and initiatives with EU climate and environment objectives.
7. Phase out harmful subsidies that maintain business models that exert disproportionate pressures on our climate and environment through their input use and pollution.

CONCLUSION

The coming years will be critical for the future of EU climate action. In the era of “simplification”, it is worth noting that in essence, what is needed is simple: we need binding Paris Agreement-aligned targets distinguishing between emission reductions, carbon sequestration in ecosystems, and permanent carbon removals at EU and national level, for the whole economy and per sector, with coherent plans, adequate EU-level policy instruments, and dedicated budgets to reach them.

With better planning and stronger enforcement, the current climate policy architecture would allow for that. Overhauling climate laws built and improved over decades could delay rather than accelerate climate action, costing us precious time, as the impacts of the climate crisis quickly worsen. In any case, changing the framework will not change the action that needs to be taken. The search for flexibilities is a denial of this reality.

Agriculture can and must pull its weight. A 30% cut to non-CO₂ emissions from agriculture by 2040, compared to 2015, is entirely feasible and should be integrated as a binding target. Alongside adequate policy instruments, this will unlock the much-needed transition to more sustainable and resilient food production. Changing what and how we produce and consume would make a major contribution to climate action and the EU's strategic self-reliance. In fact, without deep emission reductions in the sector, reaching the 2040 target will be difficult, and highly costly for other sectors.

By transitioning to agroecological practices, climate change mitigation in agriculture can

work in synergy with adaptation and building resilience by promoting nature restoration and protection, water infiltration, improved animal welfare, and reducing external input dependency. Achieving such transition will require coherent policy that aligns agricultural policy with climate and environment objectives. The largest lever at our disposal is the reform of the Common Agricultural Policy, which must redirect public money from ineffective or even harmful subsidies to driving the transition. Pricing of agricultural emissions is an important tool to finally apply the Polluter Pays Principle in the sector to address its externalised costs on the climate and society. Decades of voluntary initiatives have made clear that they are insufficient to deliver the necessary scale and speed of emission reductions in agriculture.

2030 is just around the corner, but that does not mean we have to wait for a post-2030 policy package to act. Every emission that is not emitted mitigates climate breakdown, and every effort in restoring healthy ecosystems and reducing dependencies on inputs is rewarded at the next shock. These are things that we should value highly, after another summer of consecutive heatwaves, droughts, and fires. These events have made another compelling case for urgent climate action and a fundamental reshaping of agri-food systems. However, policy makers have yet to rise to the challenge. Putting in place effective policies and instruments is necessary to drive the transition, but we already know what to do. Farmers, consumers, companies, and governments can act today.

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