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BRIEFING

THE METHANE TRAP:
HOW EUROPE'S AGRICULTURAL POLICY LOCKS IN LIVESTOCK EMISSIONS

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1. Methane emissions in agriculture

Methane is a powerful short-lived greenhouse gas, trapping around 80 times more heat than CO_2 over a 20-year period, and accounts for 66% of EU agricultural greenhouse gas (GHG) emissions. It also contributes to ground-level e pollution, which is harmful to human health and to plants and therefore has significant economic impacts through health costs and agricultural losses. Ozone exposure is estimated to reduce EU wheat production by 11.5 million tonnes per year, equivalent to economic losses of around €4 billion based on 2022 wheat prices[1] – twice as much as the estimated economic losses for all cereals due to extreme heat and drought this Summer[2].

Agriculture is responsible for more than half of all human-caused methane emissions in the EU[3], primarily from animal farming through enteric fermentation and manure management. While intensive rearing systems can achieve lower methane emissions per unit of output (e.g. litre of milk or kg of meat) due to higher productivity, these systems are built around large herd sizes and high stocking densities, therefore causing high overall emissions. Over the last decades, efficiency gains have not translated into lower absolute emissions as they have been offset by an increase in production levels of animal products.[4] Reducing agricultural methane therefore requires addressing not only emissions intensity, but also the overall scale and concentration of animal production. Animal numbers are a key determinant of agricultural methane emissions. Animal manure is also responsible for most ammonia (NH_3) emissions in the EU, which binds with other pollutants to form toxic fine particulate matter (PM2.5), a leading cause of health issues from air pollution. More than 90% of monitoring stations measured PM2.5 and O_3 above WHO levels, increasing the risk of respiratory and cardiovascular diseases.[5] Finally, intensive animal production is also a leading cause of toxic water pollution and a driver of biodiversity loss. It is therefore clear that cutting methane emissions, when done right, can deliver multiple environmental, health, and economic benefits, as well as short-term climate benefits.

2. How the CAP affects methane emissions

The Common Agricultural Policy (CAP) currently represents almost one third of the EU budget, making it one of the Union's strongest levers for shaping agricultural production. Its objectives include climate change mitigation and air quality, and its performance framework has indicators related to greenhouse gas (incl. methane) and ammonia emissions. Yet, the CAP sets no target for these emissions and is only loosely tied to the EU's legal climate and environmental commitments.[6] Instead, it requires Member States to assess their "needs" and offers funding mechanisms to address them. As with other environmental dimensions, the ambition on methane mitigation therefore depends largely on the choices Member States make in their CAP Strategic Plans (SPs).

[1] https://methanematters.eu/wp-content/uploads/2026/02/Economic-Impacts-of-O3-exposure_Final_11.02.2026.pdf
[2] https://www.theguardian.com/environment/2026/jul/22/europe-heatwave-june-farming-lost-revenue-crop-damage
[3] https://www.eea.europa.eu/en/analysis/indicators/greenhouse-gas-emissions-from-agriculture
[4] https://www.eea.europa.eu/en/analysis/indicators/greenhouse-gas-emissions-from-agriculture
[5] https://www.eea.europa.eu/en/analysis/publications/air-quality-status-report-2026
[6] EUR-Lex - 02021R2115-20240525 - EN - EUR-Lex

Early evaluations of CAP SPs found that the increased flexibility granted to Member States since 2023, which would have allowed to raise the ambition on sustainability – including methane – has largely been used for methane intensive practices.[7] Most funding still goes to economic objectives, the needs identified are often mismatched with the interventions chosen with 80% of the CAP supporting emissions-intensive animal products.[8] For example, under the 2021-2027 EU budget, €145 billion, or 38% of CAP spending, is labelled "climate spending" under the EU's climate mainstreaming objectives.[9] Yet, very little mitigation is expected, and none of it from animal rearing. The gap between stated ambition and delivery is stark. When it comes to environmental measures, Member States mostly picked the easiest conditionality options, designed eco-schemes for simplicity rather than impact, and limited the potential of well-designed agro-environment-climate commitments (AECCs) through small budgets and area coverage.

An in-depth study of the 28 CAP Strategic Plans estimated that, very optimistically, the CAP could deliver 22 Mt CO_2e of emission reductions and increased sequestration in 2023 — a 5% cut in emissions from agriculture and agricultural land use — with none of this coming from reduced methane emissions.[10] This mitigation is not showing in the GHG inventory for 2023[11], however this may be due in part to reporting issues or natural variability.

This lack of progress is unsurprising if one looks at the specific CAP instruments that shape farm methane emissions. The following sections examine which CAP instruments contribute to these emissions and which existing CAP tools could be more effectively mobilised to reduce them.

Conditionality & income support: supporting business as usual

Nearly one third of the CAP budget is spent on hectare-based income support payments, tied only to very basic environmental and social safeguards – so-called conditionality. Although these subsidies can be claimed for grazed pastures or arable land used to produce animal feed, conditionality does not include any safeguards related to methane emissions. The only relevant rules are references to the Nitrates Directive and to animal welfare legislation under Statutory Management Requirements (SMRs), which may limit further intensification of animal farming – although these merely refer to existing legislation rather than require additional measures.

Largely decoupled from production, area-based direct payments nonetheless continue to support existing structures — including animal farming systems with high absolute methane emissions — without requiring any reduction in animal numbers, stocking densities or emissions. Farms can therefore receive substantial public support without demonstrating progress on methane mitigation. Rather than driving reductions, these payments preserve the status quo and fail to offer farmers any incentive to reduce animal numbers or shift towards lower-emission production systems.

[7] Environmental and climate assessments of CAP Strategic Plans - TOOLS4CAP; New CAP unpacked and unfit - Joint report on CAP Strategic Plans
[8] https://www.nature.com/articles/s43016-024-00949-4
[9] Climate mainstreaming - European Commission
[10] Rough estimate of the climate change mitigation contribution of the CAP Strategic Plans (EU-27) over the 2023-2027 period – Follow-up with uptake data for 2023 | EU CAP Network
[11] Greenhouse gas emissions from agriculture in Europe | Indicators | European Environment Agency (EEA), Greenhouse gas emissions from land use, land use change and forestry in Europe | Indicators | European Environment Agency (EEA)

Coupled support & investment: locking in unsustainable animal numbers

Some CAP measures such as income support subsidies tied to production levels – often referred to as Coupled Support – and support for investments in farm infrastructure, are particularly problematic from a methane mitigation and environmental perspective.

Coupled Support has the stated aim to support specific sectors facing difficulties. In practice, 70% of Coupled Support is allocated to ruminant animal rearing – dairy, beef, sheep and goats – the rest going to legumes and protein crops (17%), fruit and vegetables (5%), and other crops. Despite long-standing calls to phase it out, Coupled Support still accounts for 7% (over 23 billion) of CAP expenditure and is used by all Member States except the Netherlands, and all those implementing it, except Ireland, use it to support animal farming.[12] In practice the Netherlands puts direct payments into eco schemes, which demonstrates and alternative is possible, while Ireland supports beef and sheep through Rural Development Schemes.

Because these subsidies are tied to the number of eligible animals, Coupled Support provides a direct incentive to maintain herd sizes.[13] While in some cases this is important to help maintain extensive grazing, it also supports intensive systems, where it maintains the animal populations that are the main source of agricultural methane — and can actively discourage the structural changes needed to reduce emissions.

Investment support is another double-edged sword: while it is a critical measure to support on- and off-farm investments for sustainability, it has historically been used to support investments in infrastructure, such as animal housing and manure storage, which have contributed to the intensification of animal rearing – and this continues. Such investments increase production capacity and extend the lifetime of intensive systems, and subsidies are rarely conditional on real methane reductions, lower stocking densities or livestock systems aligned with the carrying capacity of the land . As a result, CAP investment support can contribute to locking farms into production models that rely on high livestock numbers for many years, making future methane reductions more difficult to achieve. Once the available technical measures (feed, manure management) are in place, remaining emissions can only be cut by reducing animal numbers, and these investments make that economically harder. Member States' own projections show agricultural emissions only 10% below 2005 levels by 2030 with existing measures, and 13% with planned measures.[14]

Green spending: too little funding and not enough ambition

Researchers did not find any quantifiable contribution to methane mitigation from the current CAP.[15] The two most relevant CAP instruments for reducing methane are eco-schemes and agri-environment-climate commitments (AECCs). And while Member States are obliged to implement these instruments,

[12] https://agriculture.ec.europa.eu/document/download/7b3a0485-c335-4e1b-a53a-9fe3733ca48f_en?filename=approved-28-cap-strategic-plans-2023-27.pdf
[13] Keep an eye on coupled income support – CAP Reform
[14] https://www.eea.europa.eu/en/analysis/indicators/greenhouse-gas-emissions-from-agriculture
[15] Rough estimate of the climate change mitigation contribution of the CAP Strategic Plans (EU-27) over the 2023-2027 period – Follow-up with uptake data for 2023 | EU CAP Network

they have huge flexibility in how they design the measures, including what issues they address, how ambitious the measures are, and how much funding they allocate to them. For 2023-2027, 24% of Direct Payments (€45 billion) and 30,7% of the Rural Development spending (€20.3 billion) is earmarked for environment and climate objectives. Roughly 70% of coupled income support (16 billion) goes to ruminant and grazing livestock by comparison.

Only 11 out of 28 CAP SPs have a target for reducing GHG and/or ammonia emissions in the livestock sector (result indicator 13 – R.13 – one of the indicators Member States use to report CAP performance, measuring the share of livestock covered by supported commitments to reduce GHG or ammonia emissions), with only 2.4% of EU farmed animals planned to be covered by a relevant measure, even though livestock methane accounts for two-thirds of EU agricultural GHG emissions[16].

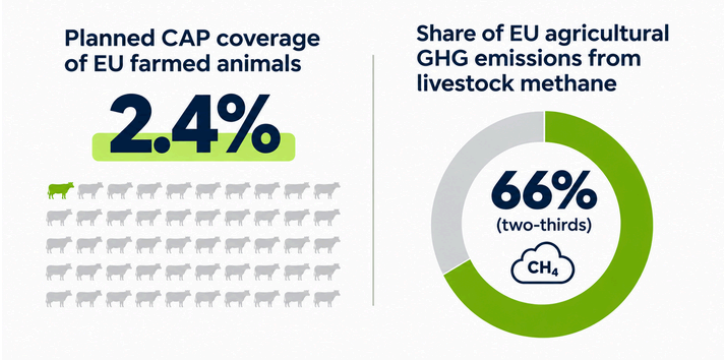


Figure 1. The gap between livestock methane emissions and CAP coverage.

A higher number of CAP SPs seek to address ammonia emissions through fertiliser and manure management (result indicator 20) and all bar one include measures to support better animal welfare (result indicator 44)[17] – both of which could have some co-benefits for methane emissions. In terms of concrete measures supported, eco-schemes include practices to ensure outdoor grazing, improved feed management, and the use of feed additives. Few AECCs address livestock emissions, those that do, target genetic improvement for cows, improved feeding, and one intervention that targets livestock reduction.

The limited number of relevant interventions and low targets on R.13 make it clear that methane reduction remains, at best, a low priority, but in many Member States, not even an objective in itself. Moreover, where measures are planned, they generally focus on technical fixes rather than addressing the structural drivers of methane emissions: high animal numbers and intensive production systems.

3. CAP Post-2027 proposal, what is needed?

The legislative proposal for the post-2027 CAP largely maintains the current architecture, with some relabelling, an increased focus on economic objectives at the cost of environmental objectives, and some timid nudges to address the pollution from intensive animal rearing[18]. Environmental organisations[19], organic farmers[20], and think tanks[21] have strongly criticised it for rolling back on the

[16] https://agriculture.ec.europa.eu/document/download/7b3a0485-c335-4e1b-a53a-9fe3733ca48f_en?filename=approved-28-cap-strategic-plans-2023-27.pdf
[17] https://agridata.ec.europa.eu/extensions/DashboardCapPlan/result_indicators.html
[18] CAP: From a flawed proposal to real transition
[19] A blank cheque and threatened green transition
[20] CAP proposal: Organics Europe criticises a huge step backwards for sustainability - IFOAM Organics Europe
[21] The post-2027 CAP and MFF proposals for the EU: first reflections on their environmental implications - IEEP AISBL

ready limited – environmental ambition of the current policy, which have resulted in almost no quantifiable contribution to reductions in methane emissions. Indeed, rather than tackling the issues highlighted above to ensure more effective spending and better contribution to EU sustainability commitments, the Commission proposal further weakens environmental safeguards and accountability mechanisms, reinforces untargeted and environmentally harmful income support measures, and fails to ringfence any funding for climate and environmental objectives.

EU Agriculture Ministers and MEPs must imperatively address the major shortcomings of the proposal to ensure the CAP effectively supports farmers in the urgently-needed transition to sustainable and resilient production models, which includes mitigating methane emissions. The recommendations below set out how this can be done. Once the CAP is adopted at EU level, Member States must use the considerable flexibility it gives them to design ambitious national plans – many of the recommendations below remains valid for the implementation phase.

Fund the transition:

- **Ring-fence green spending and scale it up.** Environment and climate spending should be ring-fenced and increase substantially each year, as recommended by the Strategic Dialogue on the Future of EU Agriculture — from the current 28% to at least 50% by the end of the next CAP period.

- **Back up the new farm-level transition measure** with dedicated funding and ensure it is grounded in well-designed transition plans.

- **Fully finance agri-environmental and climate actions with EU funds.**

- **Require action in nutrient-pollution hotspots – which tend to be also methane hotspots. As proposed by the Commission, Member States with areas affected by nitrate-related water pollution should be required to adopt concrete measures and economically support a reduction in livestock numbers enabling "farmers for extensification of livestock systems or for diversification to other agricultural activities."**

- **Incentivise plant-based diversification.** Targeted incentives should help farmers diversify into plant-based food production, lowering transition barriers, strengthening plant-based value chains and building demand for sustainable foods.

End harmful subsidies:

- **Exclude support for intensive animal rearing without clear sustainability benefits.** Introduce robust safeguards, including an improved negative list for investment and production-related support which rules out EU spending for intensive animal rearing, unless the measure leads to a substantial reduction in animal numbers and, in turn, in nitrogen and methane emissions.

- **Close the Do No Significant Harm loophole.** Delete the provision that automatically deems support linked to Farm Stewardship compliant with the Do No Significant Harm (DNSH) principle, so that DNSH guidance applies to agricultural policy too.

- **Set maximum animal densities in nitrate-vulnerable zones.** The Commission proposal presented this possibility, it should be kept and made mandatory as it will reduce animal-related environmental pressures, with co-benefits for methane and ammonia emissions.

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Useful resources

- "Cut Methane, Grow More Food: Cleaner air. Greater harvests. Safer climate" Factsheet by the Methane Matters coalition and AirClim
- "CAP: From a flawed proposal to real transition" Joint briefing by BirdLife Europe, EEB, Greenpeace and WWF presenting policy recommendations to improve the post-2027 CAP proposal

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