ANIMAL FARMS, NOT FACTORIES

CONCERNS ON THE REVIEW
OF THE INDUSTRIAL EMISSIONS
DIRECTIVE AND POLICY DEMANDS

WHAT'S AT STAKE

The EU is currently reviewing its **Industrial Emissions Directive (IED)** which is supposed to be "the main EU instrument regulating pollutant emissions from industrial installations". It requires that highly polluting industrial installations, such as power plants, waste treatment facilities, chemical factories and **intensive animal farming**, obtain national permits to operate and limit their polluting emissions. To tackle the immense health and environmental damage caused by animal farming in the EU and to encourage more sustainable farming models, the IED must cover the most polluting animal farms in Europe (which is currently not the case).

Between 2005 and 2020, the EU lost 5.3 million farms, a dramatic 37% drop. Livestock farms follow this trend. And while the number of farms is decreasing, their average size is increasing – setting us on a path of dangerous intensification.

The animal farming sector, particularly industrial livestock production, has a major and growing **climate impact**, mainly from emissions of methane (CH4) and nitrous oxide (N_2O). These are greenhouse gases which accelerate climate breakdown much faster than carbon dioxide.

According to the European Environment Agency (EEA), agriculture accounts for **56%** of all EU methane emissions, mostly from farmed animals. Animal farming also **pollutes water, air and soil** through ammonia and nitrogen oxide emissions.

In fact, **73%** **of water pollution from EU agriculture comes from animal farming**[1].
Both ammonia and nitrogen oxide contribute to air pollution by fine particulate matter (PM2.5), which causes severe **impacts on human health**[2]. Agriculture is responsible for almost the entirety (94%) of ammonia emissions. Yet there are very few rules obliging EU farms to actually reduce these emissions.

WHAT THE EUROPEAN COMMISSION PROPOSES

The revision proposed by the European Commission in April 2022, aims to include farms with more than 150 "livestock units" (LSU), addressing facilities responsible for **60% of ammonia** and **43% of methane** emissions.

LIVESTOCK UNITS

- One "livestock unit" is formally equivalent to: 1 adult dairy cow, 3.3 pigs or 33 chickens.
- Formally 150 livestock units equal to: 150 adult dairy cows, 500 pigs or 5000 chickens.
- However, since farmers keep both young and adult animals at the same time, realistically, a farm with 150 livestock units, for instance, can have 207 dairy cows, 650 pigs or 7,200 chickens.

1. Adrian Leip et al. (2015). Impacts of European livestock production: nitrogen, sulphur, phosphorus and greenhouse gas emissions, land-use, water eutrophication and biodiversity. Environmental Research Letters 10. https://iopscience.iop.org/article/10.1088/1748-9326/10/11/115004/pdf

2. The EEA estimates that at least 238.000 people died prematurely in the EU in 2020 due to exposure to fine particles (PM2,5), Nitrogen dioxide pollution led to 49,000 deaths in the EU.

Despite extending the current deficient scope of the industrial emissions rules, the Commission proposal remains unsatisfactory as it does not include the facilities responsible for almost 60% of methane emissions and 40% of ammonia emissions.

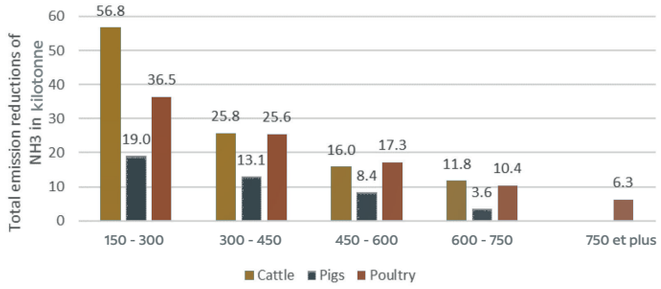
The proposal focuses exclusively on a minority of the EUs largest farms responsible for a disproportionate amount of pollution, representing only 7.5%[3] of the total 2.5 million animal farms in the EU[4] (185,000 according to the Commission's impact assessment based on Eurostat 2016 data). In contrast to some industry claims, the European Commission proposal does not include small and medium-sized farms and will not adversely impact these farmers and their livelihoods. Eurostat data from 2020, currently undergoing review, suggests that the updated directive will cover an even lower number of farms than the Commission's impact assessment estimated (134,000 as opposed to 185,000).

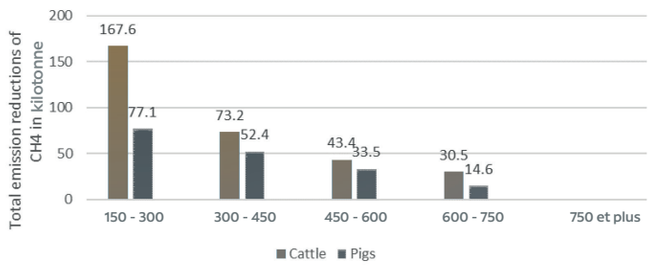
POLLUTION REDUCTION BENEFITS

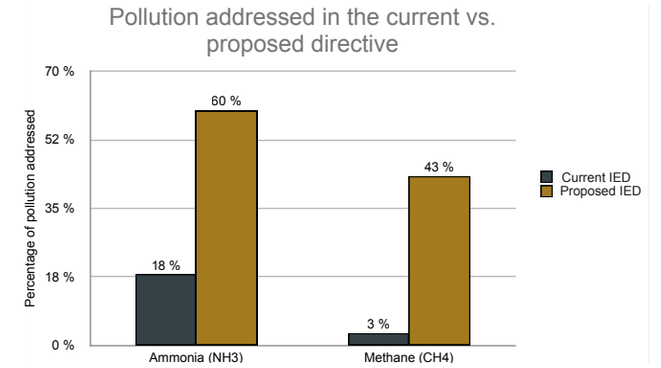
Ammonia – According to the estimates from the Commission impact assessment, the largest reduction in ammonia emissions comes from the inclusion of the cattle sector in the directive. Most importantly, *'over half of all cattle ammonia emissions are captured in the size class between 150 and 300 LSU (between 207 and 415 animals)'.* In other words, **adopting a threshold of 300 LSU would completely miss farms responsible for more than half of the ammonia emissions from the cattle sector.**

Methane – Also for methane, the largest reductions come from the inclusion of cattle farms in the directive. As for ammonia, **setting a threshold at 300 LSU would mean ignoring major methane emissions from the cattle (57%) and pig (32%) sectors.**

The current Industrial Emissions Directive addresses only 18% of ammonia (NH3) and 3% of methane (CH4) emissions, while the revised European Commission proposal would address 60% of ammonia and 43% of methane emissions.







COSTS AND BENEFITS RELATED TO LSU THRESHOLDS (COMMISSION IMPACT ASSESSMENT):

Adopting a **150 LSU** threshold would reduce the health and environmental benefits to **€5.5 billion** per year. Compliance and administrative costs combined for a 150 LSU threshold would be equal to **€265 million euro** annually.

3. The European Commission's impact assessment refers to a higher figure of 13% because it excludes all farms with less than 10 LSU, considered as subsistence farms.
4. Eurostat (2016). Farms and farmland in the European Union - statistics. https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Farms_and_farmland_in_the_European_Union_-_statistics#Farms_in_2016

WHAT GREENPEACE DEMANDS

1 THE INDUSTRIAL EMISSIONS DIRECTIVE MUST COVER MORE LIVESTOCK FARMS AND MORE INTENSIVE FARMS

Large and intensive cattle farms, as well as many more pig and chicken farms, must be subject to the Industrial Emissions Directive requirements. The directive must at least address all animal farms with over 100 livestock units and with more animals than the land they occupy can bear, according to the scientific requirements set by existing EU laws (the Water Framework Directive and the Nitrates Directive). The number of hectares available per animal is an essential criterion to define a livestock operation as industrial or not. Setting thresholds only on the basis of the number of animals reared unfairly affects extensive animal farms, which often operate more sustainably.

2 INDUSTRIAL ANIMAL FARMS MUST OBTAIN A FULL PERMIT TO OPERATE

Considering the high level of pollution coming from intensive livestock farms in Europe, all animal farms addressed by the directive must be required to obtain a regular permit to operate. The proposal to introduce a 'lighter permitting regime' runs counter to the objective of the law, which is to drive a reduction in polluting emissions. All industrial livestock farms must put in place concrete actions to significantly reduce their emissions.

3 MAINTAIN CURRENT RULES FOR THE MOST INTENSIVE FARMS

It is particularly important that pig and poultry industrial farms already subject to the industrial emissions rules currently in place continue to obtain a regular permit to operate. There is no valid justification to weaken such a provision. It would be an unjustified backtracking compared to current levels of protection for people's health and the environment, and completely opposed to the very objective of this revision.

4 DEROGATIONS FROM THE PERMIT REQUIREMENT ARE NOT JUSTIFIED

All livestock operations subject to the directive must get a permit to operate. Allowing member states to choose a "registration system" instead of requiring regular permits, infringes the principles and objectives underpinning the Industrial Emissions Directive. A simple registration would do nothing to drive livestock farms towards decreasing their polluting emissions. Even if the criteria that such registration would require will be set later via delegated acts, amendments tabled by certain MEPs show that there is an attempt to shape this registration as a simple 'notification'. The operator of a farm would only need to notify competent authorities of their intention to rear animals , not implying any reduction in polluting emissions.

5 INTRODUCE A QUOTA ON THE NUMBER OF FACTORY FARMS ALLOWED FOR EACH REGION

Because of the high number of animals in a restricted area, factory farms have serious health and environmental implications for rural communities living in the vicinity of these farms – particularly in terms of air and water pollution. National authorities must therefore monitor and address the amount of pollution emitted by several livestock operations in the same area and only allow a limited number of them to operate in each region.

GREENPEACE

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