# IFOAM Organics Europe’s statement on the Industrial Emissions Directive

Agriculture is responsible for around 55% of the methane emissions in the EU and more than 90% of EU’s ammonia emissions.[[1]](#footnote-2) Despite the fact that emissions need to be urgently reduced, the trend of the past years shows that those emissions have not decreased but remained at the same level. It is clear that there is a need to act to reduce emissions that are accelerating climate change and have a negative impact on the environment and human health.

In April 2022 the European Commission has published a proposal for a [**revision of the Industrial Emissions Directive**](https://deu01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fenvironment.ec.europa.eu%2Fpublications%2Fproposal-revision-industrial-emissions-directive_en&data=05%7C01%7Ccarolin.pagel%40bioland.de%7Cb893593090e0403e78c908da9b2c13b1%7C0d654bc55d334bf99de71515a1f543ae%7C0%7C0%7C637992911139275344%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=pYalJXWT4xWf1lAy61rzAGVi4Sdthw55jsKRVroLh5g%3D&reserved=0). It regulates pollutant emissions (to air, water, soil, greenhouse gases) of industrial installations and requires them to operate in accordance with a permit. The revision of the directive proposes to include pig, poultry and cattle farms that are above a threshold of 150 LSU, which according to the European Commission would include 13% of EU cattle, pig and poultry farmers.

IFOAM Organics Europe welcomes the proposal of the European Commission and the objective to reduce emissions from livestock rearing in the EU. The organic sector supports the aim of reducing pollution from the livestock sector that negatively impacts human health, the environment and climate. However, different farming systems do not contribute to the same extent to environmental pollution.

## Need for differentiation

We strongly urge that this legislation targets the biggest polluters and tackles industrial factory farming with detrimental effects on climate, biodiversity and animal welfare. The goal of the directive should not be to target farming systems, such as extensive grazing and organic farming, that work in line with natural cycles. It is therefore crucial to recognize and consider the spatial dimension and the importance of livestock density. It is not only about reducing the number of animals over all but also tackling the impact of increased concentration of livestock farms. Therefore, a dimension in the directive is needed that takes the density, area and type of rearing into account. It is of great importance to differentiate if animals in a farming system have access to outdoor areas and the possibility to graze.

## Importance of closing nutrient cycles

Farmers operating according to organic production rules, applying agroecological practices or working with extensive grazing systems are not the main source of pollution from the livestock sector. In fact, they improve animal welfare with adequate rearing, contribute to biodiversity enhancement on grassland and arable land, increase carbon stocks in soils and reduce greenhouse gas emissions by reducing animal numbers and adequate stocking densities, abstaining from the use of synthetic fertilizer and ensuring a minimum share of feed comes from the region. The only way forward to limit environmental pollution from livestock can be to reduce the overall number of animals and to apply agroecological practices that take the capacity of the land into account and work with nature by closing nutrient cycles.

Organic farming has a systemic approach, which stands in contrast to intensive livestock farming. The fact that animals on organic farms have access to outside areas, makes it impossible to apply the same emission reductions techniques as in closed stables. Furthermore, manure is a resource in organic farming that contributes to build soil fertility, whereas it is considered as waste in industrial farming systems.

## Industrial Emissions Directive needs to focus on intensive factory farms

The organic movement therefore asks to clearly distinguish between factory farming systems and farming systems where animals have access to outdoor areas and can preferably graze. The focus of the Industrial Emissions Directive should lie on reducing emissions from intensive landless livestock production and not from extensive grazing systems. The dimension of area and density is crucial when addressing the emissions from livestock rearing and cannot be neglected. The Industrial Emissions Directive clearly needs to make a link with the territory and if animals are kept on a farm with open areas and therefore differentiate between extensive and intensive production.

1. EEA, [Greenhouse gas emissions from agriculture](https://ec.europa.eu/eurostat/databrowser/view/tai08/default/table?lang=en) [↑](#footnote-ref-2)