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Mr Frans Timmermans  
Executive Vice-President  
Designate for the European  
Green Deal

Brussels, 7<sup>th</sup> October 2019

**RE: Open letter on the future European Green Deal: EU farmers can and are ready to deliver – but within a coherent and supportive framework!**

Dear Mr Timmermans,

— The mission letter you received from President-elect von der Leyen highlights and brings to the forefront a number of relevant challenges of a global dimension for the Union's policy preparation. In this regard, Copa and Cogeca acknowledge the future Commission's focus on working towards delivering on the United Nation's Sustainable Development Goals and moving towards a climate-neutral European continent.

— In your capacity as Executive Vice-President responsible for the European Green Deal, and ahead of your hearing in Parliament, I would like to bring to your attention a number of issues that are not only of considerable relevance for European Farmers and agri-cooperatives, but also to the different areas that your strategy will focus on. We strongly believe that the coming political cycle in Europe has the potential to define the very shape of the European farming model for the decades to come. We, as European farmers and cooperatives, are aware of and ready to navigate these difficult issues and to face the changes in store. We, as European farmers and cooperatives, seek to deliver the type of agriculture that our citizens expect and demand: agriculture which provides a high level of food security and high standards of quality, welfare, sustainability and environmental protection.

Such an approach is both a challenge and an opportunity. This, however, can only be achieved with a better functioning food chain, where farm level investments in sustainability enjoy protection against practices that our society does not want. Farmers are the first producers of food and they need safe and effective tools to carry out their activity, which consists of combating pests and diseases to guarantee both food safety and food security for the current and future world population.

Sustainability in a balanced approach between its three pillars is fundamental for farmers to deliver both on public and private goods.

**Climate neutrality and 2030 emissions reduction target**

**Farmers are the first to feel the impact of climate change and must cope with the increasing cost of adaptation and mitigation.** In its political ambition to become the world's first climate-neutral continent, Europe must follow a holistic approach. Indeed, it is important to recognize the targets, **but it is fundamental to design sustainable policies and programmes that accompany our farmers and their cooperatives towards this transition and recognize the importance of existing tools.**

EU agriculture and forestry plays a crucial role in addressing climate change adaptation and mitigation, as it has significant potential to reduce emissions, to sequester carbon and to boost

economies in a sustainable manner. Yet when addressing emissions stemming from agriculture, we must also recognise that these result from natural processes. Once the inputs in agriculture have been decarbonised, there are still emissions that cannot be avoided, which are part of a natural cycle. As for carbon sequestration, this must be taken into account when implementing the legislative instruments on climate. **A carbon market place or crediting schemes should be part of the incentivising toolbox to deliver on climate objectives.**

Increasing ambitions while reducing the CAP budget will not produce the desired results if the private sector is not properly involved.

Farmers must be encouraged to invest in technologies which reduce GHG emissions and increase carbon capture and recycling and make sense economically. These technologies include, among others, precision farming techniques and biogas plants to capture methane from manure storage. The use of external and fossil energy (electricity and fuel) in agricultural production should be reduced by using more efficient equipment, lighting and where possible, by replacing it with biofuels and other forms of renewable energy. **A farm energy programme would be useful to increase farm energy efficiency, to reduce energy consumption and to facilitate the substitution of fossil fuels by renewables at farm level.** European farmers' economic viability and competitiveness is crucial so that they can deliver on the environmental and social sustainability dimensions.

It is of vital importance that a sustainable transition is funded in all agricultural sectors. Forestry also has a crucial role to play in carbon sequestration. **With over 40% of the EU's land area covered by forests, it is clear that the European Green Deal must include an updated post 2020 EU Forest Strategy.** This will enhance forest owners' and their cooperatives' role in delivering clear results on climate change mitigation and adaptation. The future taxonomy (sustainable finance voluntary tools) must take into account existing EU and national legislation and contribute to performing sustainable forest management. In addition, it must also create a framework that promotes current and future investment in sustainable long term solutions also in agriculture.

### **Research & Innovation**

Research and Innovation are crucial for developing and providing innovative tools and solutions allowing EU farmers, their cooperatives and forest owners to improve their productivity and adapt to climate change while reducing the impact on the environment.

Innovation uptake can only be secured through their involvement in R&I activities alongside adequate investment in technologies, investment in broadband (including reliability), interoperability, digital skills and advisory services, digital innovation hubs, as well as new business and governance models. Access to up to date technologies is a key factor in keeping European agriculture competitive on a global market and maintaining our high standards. **We cannot afford to lose time by refraining from the use of cutting-edge technologies such as new plant breeding techniques, artificial intelligence (AI) and digital technologies.** Particularly NBTs could improve the tolerance of plant varieties to water stress and pests. However, every new breeding technique should be analysed and discussed by experts on a case-by-case basis and according to strict scientific criteria.

### **International negotiations**

Over the past decade, the EU has become the largest global exporter and importer of agricultural and agri-food products, making the primary sector the driver of the EU's economy and a leader of global market integration. Nonetheless, the farming community is struggling, caught between international market realities and consumer preferences. All too often, farmers and forest owners face higher input costs that consumers are not able or willing to cover. At the same time, their toolbox is shrinking.

**Any weakening of the EU's current border protection for agricultural products could dramatically undermine efforts to reduce emissions, particularly in the livestock sector, and could well prevent a net global reduction of emissions. Due to**

**the urgent nature of climate action, a chapter on the application of climate measures must be included in all free trade agreements.**

The future does not lie in decreasing productivity and shifting production as well as climate impacts (carbon leakage and water scarcity) to third countries. We have to make sure that the consumption of food and non-food products (bio-based fuels, chemicals and materials) complies with all the sustainable development goals, which includes trade policy.

The EU should, if necessary, suspend tariff preferences when non-compliance with the provisions of the agreement on sustainable development calls into question the balance of competitive conditions for European producers. **Carbon border taxes should be considered with care as they may also have an impact on increasing the costs of inputs in agriculture.**

### **Protecting biodiversity**

Farmers and forest owners are the custodians of the European countryside. Together they have made real progress on the climate and environment front, by reducing emissions and implementing more sustainable practices. **In order to continue to do so, they need environmental legislation that recognises their efforts and gives them enough flexibility to use natural resources more efficiently, while ensuring food security.**

It is therefore crucial that all of the targets in the future Biodiversity Strategy 2030, while being ambitious, are realistic. Furthermore, they must take into consideration these negative consequences of climate change as they mobilise efforts towards the global 2050 Vision for Biodiversity of “living in harmony with nature”.

Therefore **the EU must ensure that plant and animal genes and genetic natural traits which can be found in nature or obtained through mutagenesis are not patentable.**

Patents on products, traits or genes derived from genetic engineering breeding techniques should only apply to products that contain DNA that cannot be found in nature or cannot be obtained through conventional breeding methods or mutagenesis techniques.

### **Transport and blue economy**

The European biofuels sector is a pioneer in the area of producing sustainable fuels. Copa-Cogeca's aspiration is for European agriculture to be able to harness its full potential in contributing to the reduction of greenhouse gas emissions in the transport sector.

In this respect, **the extension of the Emissions Trading System to cover traffic (road transport sector) would undermine the EU's objectives of transport decarbonisation.** This would be due to the non-incorporation of EU certified sustainable crop-based fuels and advanced biofuels (as they would be replaced by fossil fuels) leading to higher greenhouse gas emissions. Moreover, a gradual phasing out of sustainable certified crop-based biofuels from the liquid fuel mix in 2030 is unrealistic. They are the most efficient tool available on the market to contribute to reducing GHG emissions in the transport sector.

### **Circular economy and “farm to fork” strategy for sustainable food**

During the last decade, the EU has been successful in supporting and promoting a sustainable circular bioeconomy. This has opened up alternatives to fossil-based materials and thus contributed to the fight against climate change. **The updated EU Bioeconomy strategy and the implementation of its action plan must therefore be a key component of the European Green Deal.** Including concrete tools in EUInvest, CAP (<https://www.copa-cogeca.eu/Download.ashx?ID=3693734&fmt=pdf>); (<https://www.copa-cogeca.eu/Download.ashx?ID=3693732&fmt=pdf>) and Horizon Europe can contribute to this and would ensure a better use of existing resources whilst creating new business opportunities and jobs for rural areas.

The “Farm to Fork” strategy for sustainable food should take into account all three pillars of sustainability (economic, social and environmental) in this broader discussion. This is the only

way to take into account the contribution of agriculture and of rural areas to food and feed production as well as biofuels, textiles and reforestation. Yet the current discussions often neglect these social and economic aspects and forget to include the human factor of farmers' work. Any future strategy must follow a comprehensive agri-food chain approach and be based on independent science-based policy making and impact assessment.

It is also not possible to implement this strategy without cooperating with consumers. Consumer information is a valuable opportunity to build trust between farmers and consumers in our agri-food chain. However, oversimplification can sometimes overshadow the key facts. Citizens should not only rely on simplistic labelling to help them follow a balanced and nutritious diet – rather learning and understanding are key to avoid transferring the responsibility of proper human health care solely to the agri-food chain.

### **Just transition**

When moving forward to a new and greener policy, a fair transition for all is of paramount importance. As highlighted above, we are facing many challenges, and farmers will be the ones to endure the biggest impact on their livelihoods and economic activity. Yet this ought not be the case. It simply must not be the case!

**The costs of implementing a new policy must be borne by all, from farmers and processors to retailers and consumers. We need to establish the “leave no man behind” concept and protect the most vulnerable from unintended consequences of the new policy.**

### **Tax policies to enable climate ambitions, including carbon border tax**

Taxation must play a central role in the European Green Deal. **We hope that you will direct the work on the review of the Energy Taxation Directive towards aligning it with our ambitions and bringing an end to fossil-fuel subsidies**. This is a key tool to avoid carbon leakage and ensure that EU companies can compete on a level playing field. The Carbon Border Tax should be fully compliant with WTO rules.

The ‘One In, One Out’ principle, which is a priority for the future Commission, must also contribute to simplification and reducing the administrative burden for farmers, especially at the time when they have to adapt in order to increase their sustainability without losing money, productivity or production quality in their fields.

In the name of millions of farmers and thousands of cooperatives across the EU, I appeal to you to consider these elements during the preparation of your proposals for the European Green Deal.

We farm for the EU, and we hope the EU will feed our future, too!

Yours faithfully,



Pekka Pesonen

Secretary General of Copa and Cogeca