

Dear UCOL TWG,

Even if late, hereby please find attached the main preliminary points from the EEB (NGO) perspective on some of the front-loading questions. The main points we wish to make are as follows:

1. the **need for preventing pollution impact from large scale (industrial scale) livestock rearing** is driven by the following

- 93% of ammonia and 55% of methane emissions stem from the agriculture sector (in large part from intensive livestock farms)
- Nitrogen deposition from high ammonia harms ecosystems
- Nitrates pollution from agriculture seriously damages water quality across the EU, in certain regions to a level that makes it unfit for human consumption. As often the depollution costs are charged to citizens (tax payer's money).

A [CREA \(2023\) study](#) (NGO) 'Upgrading Europe's air: How a strong IED can save lives and money' also quantified the air pollution damage costs broken down by sectors. The responsibility from agriculture (mainly linked to livestock rearing but this also includes fertiliser use) is huge: **72,500 annual deaths** due to exposure to PM2.5 are due to agriculture related air pollution, the greatest impacts are Made in Germany, France and Italy. We hence think it is legitimate to expect high protection ambition will be defended in particular by those governments during the KoM and throughout the UCOL review. This is a mainly due to protection of human health. The NGO study expects that an estimated 27,000 annual deaths and economic costs of **€75 billion per year** can be prevented if ammonia emissions are reduced by 1.27 million tonnes such as through the application of BAT (the use of the Maximum technical feasibility scenario under ECLIPSE 6b applying EMEP model is assumed, which includes feed strategies, BAT on manure management/storage, covered housing/abatement, use of mineral fertilizers). Other studies (EEA) indicate an annual health cost due to air pollution to amount to **€187 billion**^[2].

- The EEB has **sympathy for calls by farmers wishing to transition to sustainable farming practice and need to address the crisis so to ensure a good living condition for them**. The endeavours for more sustainable farming practice need to be genuine and verifiable e.g. through ambitious BAT on livestock.
- There are **calls for more reciprocity with imported food production**, which the EEB fully supports. It is claimed that *'High EU standards require EU livestock farmers to be world leaders, but their efforts are not reciprocated globally where they compete on an uneven level playing field'* and there are calls for "long-term visions that respects the diversity and sustainability of livestock production across Europe". We need to be clear as to how reciprocity can work in a credible and sound manner if on the one hand EU industry asks for voluntary, vague standards to apply for themselves and in the same time expect other livestock rearing competitors outside of the EU to live up to "high EU standards" claimed to be "world leaders" standards. Hence the UCOL need to be the credible, ambitious reference points to be used to clarify what is concretely meant with sustainability of livestock production.
- **We suggest to still derive best practice for cattle**, even if legally speaking, Member States can ignore it. The main reasons are that it is in the interest of EU farmers and because also cattle manure is very relevant to methane emissions and similar techniques can be used for manure (of cattle origin) as well. We therefore suggest to use the UCOL information exchange process to exchange best practice on cattle rearing, even if not legally binding the findings could be used to establish common benchmarks for the sector, to be readily used for the IED review and / or Member States wishing to enforce reciprocity rules on a fact based basis. The same BAT criteria as mentioned in Annex III of the IED 2.0 shall apply.

- **We do not support the 2LSU/ha scope exclusion** since it is not aligned to best practice on Nitrates management, for EEB it should be set to max 1LSU/ha ([see position](#)) and this is actually confirmed by the [Reactive Nitrogen Task Force as well](#).

More details as well as Answers to the Frontloading questions in the attached document. Looking forward to the KoM.