Investigation: How the CAP promotes pollution

Summary of findings

Greenpeace European Unit
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Investigation summary

The Common Agricultural Policy (CAP) plays an essential role for the agricultural sector in Europe and distributes €59 billion per year, almost 40% of the EU budget, to farmers. The policy sets out how this money is to be distributed among farmers across Europe. One of the stated objectives of the CAP is to improve the environment – but does the current CAP actually meet this goal?

Greenpeace brought together a team of investigative and data journalists across eight European countries – Austria, Belgium, Denmark, France, Germany, Italy, Poland and the Netherlands – to examine whether there was a link between CAP subsidies and the environmental impacts of industrial livestock installations.[1]

The investigation was commissioned by Greenpeace France, but carried out independently by the eight journalists between December 2017 and April 2018. They focused on industrial livestock farming, as the ecological impact of this sector is particularly high.[2] One of the many academic studies on the topic states the facts coldly: "*Livestock production is among the most ecologically harmful of all anthropogenic activities. It has massive direct and indirect contributions to global warming besides causing widespread eco-degradation in other ways*."[3] Putting meat on our plates is a known threat to our future, and the danger is growing in lockstep with the market for meat.

[1] Mark Lee Hunter (France) Stefan Wehrmeyer (Germany), Nils Mulvad (Denmark), Delphine Reuter (Belgium), Matteo Civillini (Italy), Benedikt Narodoslawsky (Austria) and Patryk Szczepaniak and Julia Dauksza (Poland). A parallel investigation by Luuk Sengers and De Groene Amsterdammer took place in the Netherlands
[2] See also Greenpeace report "Less is more": https://media.greenpeace.org/archive/Report--Less-Is-More-27MZIFJXW7U47.html
[3] Tabassum-Abbasi et al., "Reducing the global environmental impact of livestock production: the minilivestock option" Journal of Cleaner Production,Volume 112, Part 2, 20 January 2016, Pages 1754-1766

RESEARCH FINDINGS – KNOWLEDGE GAPS

The researchers came to the conclusion that the information the European Union uses to shape its Common Agricultural Policy, and in particular the data related to agricultural pollution, are so scattered and incomplete that they could not be relied upon to properly address agricultural pollution.

This finding is corroborated by the European Court of Auditors which, in its 2016 opinion on the CAP cross-compliance, stated that "*the* [European] *Commission currently cannot be sure whether the system is contributing to a more sustainable and environmentally friendly agriculture.*"[4]

Only one pollutant, ammonia (NH_3), is consistently reported in the European Pollutant Release and Transfer Register (E-PRTR) – but only farms raising more than 40,000 chickens, 2,000 pigs or 750 sows are required to submit data to this register. This is why the investigation focused on pig and poultry farms.

The reporting system for ammonia releases, the limitations of which are further explained below, meant that the investigation could not focus on bovines and ruminants in general. Despite being responsible for the production of enormous quantities of ammonia and methane, among other pollutants, ruminants are not covered by the E-PRTR.[5]

WHAT IS AMMONIA AND WHY IS IT A PROBLEM?

Ammonia (NH_3) is a chemical compound with a characteristically pungent smell and is released mainly from agricultural activities. Ammonia can severely impact human health and wildlife if released into the environment. The majority of ammonia pollution comes directly from livestock farming. In 2015, the EU agricultural sector emitted a total of 3,751,000 tonnes of ammonia, making up 94% of the EU's total ammonia emissions that year.[6] Ammonia is a nitrogen compound and plays an important part in the natural nitrogen cycle, the process of circulation of nitrogen in different forms through nature. Agricultural ammonia pollution comes from the use of livestock manure, as well as synthetic fertilizers. Ammonia from manure can enter the surrounding environment via the air ("dry form") or dissolved in liquids ("wet form"), polluting the air or waterways. Manure can emit ammonia at any stage from animal housing and grazing, from manure storage or during application of the manure as a fertiliser.

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[4] European Court of Auditors, "Special report no 26/2016: Making cross-compliance more effective and achieving simplification remains challenging". Press release, Oct. 27 2016 https://www.eca.europa.eu/Lists/News/NEWS1610_27/INSR_CROSS_COMPLIANCE_EN.pdf

[5] REGULATION (EC) No 166/2006 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 18 January 2006 concerning the establishment of a European Pollutant Release and Transfer Register and amending Council Directives 91/689/EEC and 96/61/EC https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32006R0166&from=EN

[6] European Environmental Agency - National emissions reported to the Convention on Long-range Transboundary Air Pollution (LRTAP Convention) https://www.eea.europa.eu/data-and-maps/data/national-emissions-reported-to-the-convention-on-long-range-transboundary-air-pollution-lrtap-convention-11

Environmental problems

Ammonia runoff from fertilizer or manure slurry can cause 'eutrophication' of rivers, lakes and seas – the over-enrichment of nutrients impacting in particular aquatic systems. The ammonium ions deriving from ammonia are an easily available form of nitrogen for algae to consume. Excess ammonia can cause algal blooms, especially the rapid growth of choking green algae which outcompetes other plants. These algal blooms use up all the oxygen in the water, to the detriment of biodiversity in aquatic ecosystems. These zones of eutrophication can be left completely devoid of life.[7]

Health problems

Ammonia from livestock and synthetic chemical fertilisers can also affect air quality. When it is released into the atmosphere in gaseous form, ammonia can worsen the impact of fine particulate matter (PM2.5) contamination and negatively affect human respiratory health.[8] In Europe, Russia, Turkey, Korea, Japan and the eastern USA, the agricultural sector is an important source of fine particulate matter PM2.5 pollution.[9]

This is a serious problem for farmers and farm workers, who can develop asthma and other chronic diseases, but it does not impact only them. Research found that simply living in close proximity to intensive livestock farms could adversely affect respiratory health (those living near farms were found to have asthma-like conditions).[10] The study assessed the effect of environmental exposure to air pollution emitted from confined animal feeding on 6,937 adult residents of four German towns located within 500 metres of intensive livestock farms. In addition to reports of lung problems, 90% of study participants reported being annoyed by the strong smell.

Ammonia releases do not only affect humans. The first victims of ammonia are the animals reared in such industrial farms, because it is harmful to their respiratory systems. The next victims are fish and aquatic organisms impacted by ammonia runoff into waterways.

Economic consequences

Those living in the vicinity of industrial livestock farms might not only be affected by ammonia pollution from a health and environmental perspective, but also economically. In Poland for instance, researchers found that the value of residential properties next to intensive chicken

[7] Diaz, R. J., & Rosenberg, R. 2008. Spreading dead zones and consequences for marine ecosystems. Science, 321: 926–929
[8] Paulot, F., & Jacob, D. J. 2013. Hidden cost of U.S. agricultural exports: Particulate matter from ammonia emissions. Environmental Science and Technology, 48: 903−908
[9] Lelieveld, J., Evans, J. S., Fnais, M., Giannadaki, D., & Pozzer, A. 2015. The contribution of outdoor air pollution sources to premature mortality on a global scale. Nature, 525: 367–371
[10] Radon, K., et al. 2007. Environmental exposure to confined animal feeding operations and respiratory health of neighboring residents. Epidemiology, 18: 300-308

farms dropped significantly in some affected areas.[11]

'POLLUTER GETS PAID' PRINCIPLE

The surprising reality is that the 'polluter pays' principle enshrined in the EU Treaty, which should underpin all EU legislation, has transformed into the 'polluter gets paid' principle.[12]

In the countries examined, CAP subsidies are paid to intensive livestock installations, where animals are raised by the thousands (in the case of chickens, tens of thousands) and where emissions of environmental pollutants are so high as to be officially registered in the E-PRTR for industrial facilities. Of all the countries examined, only Austria has no livestock farm been listed in the E-PRTR for 2015.[13] As explained below, the researchers in Austria instead considered livestock farms meeting the criteria set by the IPPC/IED[14] rules, which also concern very intensive farms.

Intensive livestock farms generating the highest amounts of pollution are among the recipients of large CAP subsidies.
Of the 2,347 examined livestock farms emitting high levels of ammonia and registered in the E-PRTR, 51% of them, 1,209 received CAP payments totalling €104 million, including environmental subsidies.

LIMITATIONS OF THE EU REPORTING SYSTEM

Currently available data do not show the whole extent of the problem. On the contrary, the threshold for inclusion in the E-PRTR is so high that only a small proportion of intensive farms appear in the EU dataset. Ammonia releases are estimated based on the amount of livestock produced. According to Regulation 166/2006 establishing the E-PRTR, only farms releasing more than 10,000 kilograms of ammonia per year – the amount that would be generated by 40,000 chickens, 2,000 pigs or 750 piglet-bearing sows – are required to report ammonia emissions.[15] The E-PRTR does not include data on ruminants like cows and sheep, as only pigs

[11] Example: Pienkowski S., 2017. Expertise concerning the change of value of building lands after construction of four livestock buildings for poultry farming https://www.gminabaranow.pl/images/2017/Zalaczniki/09/Opinia_Sniadowka_Grunty.pdf
[12] Article 191(2) of the Treaty on the Functioning of the European Union
[13] This does not mean that Austrian livestock farms do not emit high quantities of ammonia. Austria in fact emitted 66,800 tonnes of ammonia in 2015, with the agricultural sector being alone responsible for 94% of such emissions (see country profile on Austria below). It simply means that no individual farm is big enough to be obliged to report within the E-PRTR
[14] Integrated Pollution Prevention and Control (IPPC), Directive 2008/1/EC of the European Parliament and of the Council of 15 January 2008 as repealed by Directive 2010/75/EU of the European Parliament and of the Council of 24 November 2010 on industrial emissions (IED)
[15] REGULATION (EC) No 166/2006 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 18 January 2006 concerning the establishment of a European Pollutant Release and Transfer Register and amending Council Directives 91/689/EEC and 96/61/EC https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32006R0166&from=EN

and poultry farms are required to register. It is therefore extremely difficult to know the total number of farms that are polluting, and how much each of them is polluting.

CAP PAYING TOP POLLUTERS – NATIONAL FINDINGS

Despite the shortcomings in the monitoring and reporting system, researchers from seven out of eight European countries were able to identify a clear pattern of CAP subsidies funding the most polluting farms.

Belgium

In Belgium 64 pig and poultry farms were listed in the E-PRTR in 2015, each emitting more than 10 tonnes of ammonia. All together, these livestock operations emitted 1,311.8 tonnes of ammonia in the same year. The European Environmental Agency (EEA) reports that Belgium produced 65,500 tonnes of ammonia in 2015. According to Eurostat, the total ammonia emission from agriculture in 2015 in Belgium was 60,000 tonnes.[16]

These calculations show that agriculture represents 91.6% of the total ammonia emissions for Belgium in 2015. In addition, since total ammonia emissions from agriculture amount to 60,000 tonnes, the E-PRTR only represents 2% of the ammonia produced in Belgium in the reference year. This is probably due to the fact that E-PRTR doesn't take into account the bovine sector (much more widespread, in the south of Belgium, than pigs and poultry farms), nor the spreading of manure in its calculations. In 2016 Belgium counted 36,888 farms, out of which 4,528 were raising pigs and 2,107 poultry.[17]

In Belgium, much of the data on polluters is effectively kept confidential by authorities and varies from one region to the next. Almost all ammonia pollution in Wallonia – a total of 19,000 tonnes in 2014 – comes from the agriculture sector.[18] In Flanders, the addresses of polluting farms are reported, but not their names. In Wallonia, the cities where farms are located are reported, but not their full addresses. As the reporting of ammonia is based on the location of the site of the farm, not the address of the company, researchers took a conservative approach and counted only farms for which there was a clear match. Researchers identified 42 livestock farms (30 pig farms and 12 poultry farms), of which 35 received CAP subsidies in 2016.[19] These 35 recipients received €1.29 million in CAP subsidies.

[16] https://www.google.com/url?q=http%3A%2F%2Fec.europa.eu%2Feurostat%2Fstatistics-explained%2Findex.php%2FAgri-environmental_indicator_-_ammonia_emissions
[17] Tab A: Chiffres agricoles 2016 https://statbel.fgov.be/fr/themes/agriculture-peche/exploitations-agricoles-et-horticoles#figures
[18] http://www.awac.be/index.php/thematiques/inventaires-d-emission/par-polluants/emissions-de-nh3
[19] In Belgium, 64 farms were reported in 2015 to the E-PRTR. The researchers could not identify with certainty 18 of them. In total, they identified 46 stables (E-PRTR uses the locations of the stables, not the official address of the farm). One Flemish farm was present five times, with five different stables, so it was counted as one farm for the purposes of the analysis. This is why there are 42 identified farms.

Denmark

In Denmark, 69 farms were registered in the 2015 E-PRTR, 45 raising pigs and 24 poultry. All together they released 967.8 tonnes of ammonia that year, 39% from poultry farms, the remaining 61% from pig farms. This represents 1.4% of the total emission of ammonia from farming in Demark. So, an astonishing 98.6% of Danish ammonia emission from farming is not recorded in the E-PRTR. In 2015, Denmark counted 14,827 livestock farms, of which 2,400 raised pigs. Ammonia emissions in 2015 in Denmark amounted to 72,760 tonnes, of which 95% came from farming (68,980 tonnes).[20]

Researchers could match 59 of the 69 polluters to recipients of CAP subsidies in 2016. These farms received €8 million in farm subsidies, including €2.41 million earmarked for environmental protection.

France

France, despite being the third-biggest pork producer and second-biggest chicken producer in the EU, has only 727 companies in the E-PRTR, while around 31,000 farms are known to be producing pigs, chickens, geese and ducks.[21] The Ministry of Agriculture last surveyed pig farms in 2010, counting 22,300 farms.[22] However, 11,500 of those farms, with a minimum of 100 pigs, accounted for 99% of the production.

Of the 727 companies that appeared on E-PRTR, 436 got CAP money in 2015. Sixty farms included on the E-PRTR received over €65,300 in 2015, putting them in the top 10% of CAP recipients in France for that year. Being among France's top polluters is clearly no barrier to accessing CAP subsidies.

In 2014, France produced 708,000 tonnes of ammonia, 98% of which (693,840 tonnes) came from agriculture. This made France the European leader for reported ammonia emissions.[23] In 2010, pig producers generated 10% of the French ammonia emissions, while poultry producers generated 15% of the total.[24] Despite the fact that the bovine sector accounts for 60% of French emissions, such a relevant part of the livestock sector could not be included in this research since it is not covered by the E-PRTR.

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20 http://dce.au.dk/fileadmin/dce.au.dk/Udgivelser/Notater_2017/DCE_Notat_vedr_ammoniakfremskrivning_2016_2035.pdf page 2

21 http://www.pleinchamp.com/elevage/porcs/actualites/la-filiere-porcine-en-chiffres https://www.volaille-francaise.fr/la-filiere-avicole/chiffres-cles/

22 http://agreste.agriculture.gouv.fr/IMG/pdf/primeur300.pdf

23 http://www.ademe.fr/entreprises-monde-agricole/reduire-impacts/reduire-emissions-polluants/emissions-dammoniac-nh3

24 http://www.ademe.fr/sites/default/files/assets/documents/20120301_les-emissions-agricoles-de-particules-dans-l-air-etat-des-lieux-et-leviers-d-actions_ademe.pdf page 13

In 2015 French farms reported 13,529 tonnes of ammonia to the E-PRTR. This means that over 98% of ammonia emissions from agriculture in France is not shown in the E-PRTR.

Germany

The German E-PRTR data contains 603 animal production facilities with 421 pig farms, 174 poultry farms, six mixed and two other facilities and a total of 13,339 tonnes of ammonia released in 2015. Total ammonia emissions in the E-PRTR for Germany in 2015 amounted to 16,944 tonnes, making the intensive livestock sector alone responsible for almost 80% of the ammonia emissions registered in the E-PRTR.

The analysis shows that 127 (21%) of the facilities registered in the E-PRTR have directly received farm subsidies under the CAP in 2015 amounting to €31.6 million. These subsidies are not evenly distributed. Half of these facilities got less than €92,000 and the top 6% of farms in the E-PRTR, in terms of CAP subsidies, got more than €1.1 million each.

Italy

In Italy, 874 farms each emitted more than 10 tonnes of ammonia in 2015, according to the E-PRTR. The number of individual companies (some reported ammonia emissions for more than one farm) in the E-PRTR was 739. Together these farms emitted 46,000 tonnes of ammonia that year. This represents 12.8% of the total ammonia emissions from farming in Italy. 87.2% of Italian ammonia emissions from farming are not recorded in the E-PRTR. Italian agricultural ammonia emissions in 2015 reached 378,000 tonnes, which represents 95% of total ammonia emissions for the country.[25]

CAP subsidies were paid to 67% of the 739 polluters – 495 farms. These farms received a combined €25.64 million in CAP subsidies.

Poland

The E-PRTR listed 123 intensive livestock farms in Poland in 2015, 87 poultry farms and 36 pig farms. Researchers also accessed the Polish register POL PRTR, which forms the basis for the E-PRTR reports, where 100 entities reported ammonia emission for a total of 1,732.5 tonnes of ammonia in 2015 (higher than the 123 farms registered in the E-PRTR) with 61% coming from poultry farms.[26] The POL PRTR for 2016 lists 106 farms emitting 1.864,7 tonnes of ammonia.

At the end of 2014, 783 Polish livestock farms were also large enough to meet the requirements set by the IPPC/IED rules for industrial emissions (farms with space for 40,000 hens, 2,000 pigs, or 750 sows), a size that should make many of them eligible for inclusion on the E-PRTR. In March 2018, that number increased to 1,031 operations. In other words, the 2015 E-PRTR

[25] Eurostat: http://ec.europa.eu/eurostat/statistics-explained/index.php/Agri-environmental_indicator_-_ammonia_emissions
[26] http://mapy.gios.gov.pl/prtr/

dataset, which records only 123 Polish installations, covers less than 15% of the intensive livestock farms that could potentially be surpassing the E-PRTR threshold in terms of available space for livestock.

Total ammonia emissions for Poland in 2015 amounted to 267,312.2 tonnes, of which 259,796 tonnes (97%) came from agriculture (with 83% linked to manure).[27] So less than 0.6% of Polish animal farming emissions are reported to the E-PRTR.

As regards CAP money, the recipients' registers for 2015 lists 19 companies that own 36 out of 48 corporate farms releasing ammonia. In 2015 these companies have received €8,748,250, mostly as direct payments.

The owners of another 52 farms that released ammonia could not be verified with certainty on the basis of the available registers.

The Netherlands

In the Netherlands, only 49 out of 34,000 livestock farms have reported their pollution to the E-PRTR in 2015. Emission figures for the other farms are only known by national authorities but kept confidential for privacy reasons. Three of those 49 farms listed in the E-PRTR received CAP subsidies in 2015.

Researchers found that, since 2003, there has been a substantial increase in the number of intensive livestock farms in the Netherlands, from 300 to over 800.[28] In 2015 the Dutch government passed a law to reduce ammonia pollution, which forbade the construction of new "megafarms" (farms with more than 7,500 pigs, 1,200 sows, or 120,000 chickens). However, the legislation left a significant loophole since *existing* farms were still allowed to expand into intensive livestock installations. As a consequence 47 more intensive sites appeared in the countryside.

Austria

In 2016 Austria had 24,224 pig farms, while in 2013 it counted 68,750 poultry farms (57.945 hens, 7757 ducks, 2113 geese, 935 turkeys).[29] According to the Austrian environmental agency (Umweltbundesamt), Austria emitted 66,800 tonnes of ammonia in 2015, with the agricultural sector being alone responsible for 94% of these emissions.[30]

[27] http://www.kobize.pl/uploads/materialy/materialy_do_pobrania/krajowa_inwentaryzacja_emisji/Bilans_emisji_za_2016-raport_syntetyczny.pdf page 9
[28] For more information on the Dutch research findings, see: https://www.groene.nl/artikel/de-boer-broeit-voort
[29] Grüner Bericht, page 156 https://gruenerbericht.at/cm4/
[30] http://www.umweltbundesamt.at/fileadmin/site/umweltthemen/luft/emi_2017/Hintergrundinformation_NEC_OLI_2017.pdf

Despite the high number of livestock farms and the significant ammonia emissions in the country, no individual farm in Austria is large enough to appear in the E-PRTR, which covers pig and poultry farms rearing 40,000 chickens, 2,000 pigs or 750 sows. This means that ammonia emissions in Austria are not reflected in the E-PRTR. The lack of any such data again shows the shortcomings of the current EU pollution monitoring and reporting system.

However, according to the EDM-register coordinated by the Austrian environmental agency (Umweltbundesamt), Austria has 53 livestock farms which fulfil the criteria of the IPPC/IED Directive (Directive 2008/1/EC as repealed by Directive 2010/75/EU on Industrial Emissions), which aims to prevent and control pollution from industrial activities.[31] This directive covers industrial pig and poultry farms when they have "more than 40.000 places for poultry, 2.000 places for pigs or 750 places for sows". The IPPC approach does not relate to the actual number of animals raised (as the E-PRTR does) and the subsequent ammonia emissions, but to the capacity of industrial livestock farms.

However, according to the Austrian Statistics Agency, which collects data for reasons of public hygiene, in Austria there are 152 farms which have space for at least 40.000 hens, 2.000 pigs or 750 sows. This contradiction in numbers (53 versus 152) shows once more the limitations of the system. It is unclear how can two agencies in the same country assess the same farms but reach results so different from one another.

According to the researcher's calculations 36 of the 49 IPPC-farms in Austria (four IPPC-farms belong to two farmers) received around €1.6 million. The size of subsidies varies significantly, with the biggest CAP beneficiary getting €872,446 and the second biggest €153,554, the only two beneficiaries getting more than €100,000. Eighteen IPPC-farms received between €10,000 and €30,000, 12 received between €1,000 and €10,000.

In December 2017, a project to build an intensive farm for poultry in Bad Zell failed due to community protests. The proposed farm was intended to house 39,500 chickens, a few hundred fewer than the number that would have earned it a spot on the E-PRTR database.

[31] https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32010L0075&from=EN

ADDITIONAL CONCERNS HIGHLIGHTED BY THE INVESTIGATIONS

Limitations in the reporting and monitoring of ammonia emissions, and other pollutants, are not the only obstacles to knowing how much pollution the livestock sector creates and the exact location of this pollution. In the Netherlands, in February 2018, it was revealed that up to 2,100 cattle farms had lied about the number of mature cows, and hence the levels of pollution, on their land.[32] The scheme involved reporting milk cows, which count for one unit in environmental calculations, as immature heifers, which count as half a unit, because they produce less excrement per head. The trick required farmers to report that mature cows were giving birth to multiple calves, and it was uncovered only when food safety authorities noticed a massive increase in the reporting of twin births. Despite the fraud, the Dutch government won a renewed exemption from the application of the EU Nitrates Directive (91/676/EEC) concerning the amount of manure that can be produced on farms.[33]

An additional element the research brought to light is that the CAP, in combination with existing environmental regulations, has encouraged investment in intensive farms whose size and production falls just under reporting requirements. Livestock operations have been designed to exploit the blind spots in regulations. Creating smaller farming enterprises, each polluting up to the maximum allowed by the regulations, allows the pollution to stay at farm level, divided into discrete units that require no authorisation from environmental authorities, while the parent firms collect the CAP subsidies. In other words, taxpayers contribute through CAP subsidies to the further development of industrial livestock installations, and then pay again to clean up the pollution that these firms create.

Another concern relates to the many conflicting authorities and regulatory requirements which make it impossible to collect clear, comparable and verifiable data on pollution levels. Certain national institutions collect the names and addresses of farms producing animals in excess of European reporting levels (E-PRTR). Other registers are based on the farms' capacity (IPPC) instead of their estimated emissions. Other authorities, in charge of veterinary inspections, are responsible for collecting data on the actual numbers of animals at each farm, but this often does not match the E-PRTR nor the IPPC register.

There are further obstacles to the collection of trustworthy and precise data on agricultural pollution. Data collection relies, for the most part, on farmers' declarations. However, as the fraud in the Netherlands shows, livestock producers do not have an incentive to declare the true number of animals they farm, nor their possible intentions to further expand their installations beyond EU thresholds, nor even to fill out the forms in the first place. It is therefore essential for policies to encourage better compliance with worthwhile reporting.

There are also instances where one person, or one firm, owns a number of farms, each of which collects CAP subsidies, and each of which reports (or does not report) its emissions separately.

[32] https://nltimes.nl/2018/02/08/dutch-dairy-fraud-case-forces-temporary-ban-2100-cattle-farms
[33] http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:31991L0676&from=EN

Various exemptions allow owners of a farm, or several farms, to remain anonymous in the official databases. One large family livestock business could be registered as several smaller farms, each owned by different family members. A corporation can register separate farms as subsidiaries.

The data collected in Poland, for example, show that by splitting large holdings into smaller units, firms can engage in intensive farming practices that would lead to the obligation of reporting if the farms were considered a single unit. According to the Polish Ministry of the Environment, between 2007 and 2016, 113 Polish farms that met emissions reporting requirements were split into at least 245 smaller entities, which now do not meet the threshold individually for inclusion on the E-PRTR.[34]

CONCLUSION

The results of the investigations carried out in the eight countries mentioned above are unequivocal. The EU's Common Agricultural Policy is funding some of the most polluting livestock farms. The negative health and environmental impacts of the livestock sector are not properly monitored nor assessed, neither at national nor at European level.

Public money must be spent to support farming that works with nature, not against it. Taxpayers' money should not be used to reward the heaviest agricultural polluters. To reach these objectives, it is imperative for the upcoming CAP reform to use precise and up-to-date farm data.

We therefore urge EU Institutions and member states to:

1. Establish a complete and regularly updated database of farm emissions of ammonia, starting from a value of 1,000 kg per year;
2. Ensure that the CAP specifically contributes to reducing ammonia emissions, by:
    a. encouraging the reduction in the number of animals raised, particularly in regions already intensively farmed;
    b. encouraging the adoption of extensive systems favouring outdoor grazing;
    c. incentivising the adoption of better housing systems that both improve animal welfare and lower emissions of pollutants, ensuring covered outdoor space for animals and effective manure management;
3. Ensure a tight implementation of the Nitrates Directive at national level, promoting the adoption of manure management technologies that minimise ammonia emissions, such as by limiting the time between manure applications and tilling;
4. Ensure that all farms have a complete 'nutrient balance sheet', taking stock of how much feed, manure, and any other nutrients enter and leave the farm, in order to avoid the release of pollutants in excess of what the environment can absorb;
5. Make sure that CAP payments are fully transparent and records are freely accessible to the public in all member states.

[34] http://orka2.sejm.gov.pl/INT8.nsf/klucz/658C47F0/%24FILE/i15487-o1.pdf

Greenpeace contacts

Greenpeace EU press desk: +32 (0)2 274 1911, pressdesk.eu@greenpeace.org

Marco Contiero, Greenpeace EU agriculture policy director: +32 47 777 7034, marco.contiero@greenpeace.org

PRESS CONTACTS IN NATIONAL GREENPEACE OFFICES

Austria: Nora Holzmann +43 664 6103 998, nora.holzmann@greenpeace.org

Belgium: Jelle de Mey +32 476 20 78 11, jelle.demey@greenpeace.org

Denmark: Poul Bonke Justensen +45 2629 4938, poul.bonke.justesen@greenpeace.org

France: Cecile Cailliez +33 6 13 07 04 29, cecile.cailliez@greenpeace.org

Germany: Christiane Huxdorff +49 171 6035529, christiane.huxdorff@greenpeace.org

Italy: Felice Moramarco +39 348 7630682, felice.moramarco@greenpeace.org

Poland: Krzysztov Cibor +48 737 49 22 66, krzysztof.cibor@greenpeace.org

The Netherlands: **Abdellah Dami** +31 625 03 10 02, abdellah.dami@greenpeace.org