



ECVC's contribution to the European Commission's Initial Impact Assessment , in the framework of the "Restoring Sustainable Carbon Cycles" initiative.

The EU needs a comprehensive strategy to preserve and develop sustainable agriculture in Europe. This strategy must produce enough healthy food to feed all Europeans; drastically reduce greenhouse gas emissions from agriculture and food systems; preserve, restore and enhance biodiversity in the countryside and nature; create more and better employment in rural areas; and improve the income and working conditions of farmers and farm workers. The Carbon Farming Initiative (CFI) must be based on sustainable family farming involving many European farmers.

Positive recognition of environmentally beneficial agriculture

ECVC welcomes solutions to reduce the European agricultural footprint, notably greater support for small- and medium-scale farming. Industrial agriculture, globalised food systems and their value chains have a huge climate impact. Public policy should thus support agricultural models that are greenhouse gas sinks, as a public good. However, ECVC rejects the CFI and carbon credits because of the severe impact it will have on land, farmers and agricultural models.

Missing mention of agroecology and questioning a radical shift towards new technologies

Most small-scale farms (small in terms of capital) are labour intensive and use agroecological¹ methods that aid biodiversity and act as efficient greenhouse gas sinks. Studies² show that a radical reorientation towards a mainstream agroecological model in Europe is possible and can feed Europe. However, this roadmap does not recognise those who already use or are willing to use agroecology, agroforestry or peasant farming, but rather incentivises investment in technology.

The roadmap is oriented towards technology-based solutions and so-called innovative research. These technologies (GMOs, genome editing, pesticides, drones, remote sensing, etc.) are expensive, inaccessible to most farmers³, counterproductive in tackling climate change and often a source of debt. The results of their use are often unpredictable and have generally proven to be detrimental not only to the environment, but also to society and health. This leads to a decrease in rural employment, rural depopulation and desertification. It changes farmers' relationship with land, depriving them of free will over their territory and their objects of work. The CFI should support farmer-led innovation and should set up evaluation committees to involve farmers in technology impact assessments.

¹ COAG/2018/5 - Vingt-sixième session – FAO, Rome, 1-5 octobre 2018

² See IDDR1's Ten Year Project for Agroecology (2021)

³ 235,320 farms in total in the EU have a standard production (SP) of 250,000 euros or more



Climate commodification is dangerous and leads to more environmental and social damage

The CFI must radically reduce emissions instead of offsetting them. ECVC is opposed to any carbon credit system and carbon market.

The social and environmental impact of other carbon credit mechanisms, such as REDD+ globally and Carbon Farming in Australia are documented and dire. They also failed to improve climate change mitigation.

The speculation of agricultural practices and land must be stopped. A carbon market on land will lead to more land grabbing and concentration, preventing young farmers from accessing land and damaging biodiversity, food security and food sovereignty. CAP subsidies also lead to similar phenomenon of land grabbing. The EC must address this and work on a new land tenure directive.

Market regulation tools are needed to enable climate-friendly agriculture

The roadmap announces "new business models" for farms. It is important to remember that the primary function of farmers is to produce food, not to sell carbon credits. Farmers need better conditions to implement environmentally and climate friendly practices for food production. For this, they need recognition of the amount of work this entails, notably through fairer prices for their products that no longer fall below production costs.

ECVC is committed to fighting climate change and shares the objectives proposed in the F2F Strategy, but we see that there are not enough instruments to act on the markets, there is a major clash with trade policy and there is not enough economic support for a just and inclusive transition for farmers in Europe.