



With the endorsement of:



Friends of the Earth Europe



Brussels, 2 May 2021

Open letter: The consultation on “Certification of carbon removals” is disingenuous

To: Executive Vice President Timmermans, Commissioner for Climate

Dear Executive Vice-President Timmermans,

The Consultation on the certification of carbon removals¹ is heavily biased towards a carbon offset and crediting approach. Its multiple choice questions are single-mindedly focused on setting up a removals certification system dependent on voluntary carbon market offsets, foreclosing genuine inquiry and consideration of other approaches for a removals framework. It therefore leaves little space for critics of this flawed approach, which will in turn have devastating consequences not only for the climate, but also for rural areas.

While we, as the European Coordination Via Campesina and endorsers, believe firmly that a transition of the agricultural system needs to happen and that farmers must be supported towards better practices, we have expressed several times that certifying carbon sequestration on agricultural land for credits sold on voluntary carbon markets is the wrong solution. Our call has thus far been ignored. Please let us remind you once again of the reasons for our objections:

- **The monitoring, reporting and verification (MRV) systems which are focused narrowly on carbon and crediting carbon removals impose processes that make autonomy impossible for farmers, increase their liability risk and therefore directly threaten Food Sovereignty. They are both too risky for farmers and insufficient to achieve actual climate ambition.**

¹ https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13172-Certification-of-carbon-removals-EU-rules_en



- Farmers' autonomy over their practices is directly threatened by the fact that the planned mechanisms are managed remotely, by stakeholders who do not know the territory involved and its rich socio-cultural and economic context. MRV mechanisms are complex and require a high level of technical expertise. .
- While the Commission call it a “new opportunity”, we see that farmers are bearing all the risks while companies are only benefitting. The Commission can no longer afford to ignore the poverty and despair that takes place in the farm sector. France reports a farmer suicide every two days². The risk of liability for farmers for impermanent land-based sequestration cannot be understated. What farmers who are implementing farming practices that are good for society and the environment need is rather stable and predictable income.
- MRV processes place a heavy burden on farmers with uncertain returns. The collection of opinions from experts and consultants and data requirements imposed at each stage of the protocols make farmers liable for failure and even more vulnerable to external pressure and control. The Commission must come to terms with the direct relationship between farmer poverty and despair and the increasing level of control and intrusion in their livelihoods. MRV protocols will require the smallest actions of farmers to be monitored and recorded, including their work rhythms and production choices, providing large quantities of farmer-owned data to corporations that in many instances have a vested interest in selling other products to farmers. We consider that this control of data gives all too much liberty to those who own it to intrude on the land. New technologies that further remove decision making autonomy from farmers are not welcome.³
- The collection of data bears an enormous cost not only in terms of the outsider “experts” surveying the land but also regarding the price of new technologies required to calculate and maintain sequestration. The European Commission promises a standardised certification system by 2023, in spite of the proliferation of various labels. One of the best-known ones is the Gold Standard. For a certification allowing access to the large voluntary carbon markets or to compliance markets like the ETS, it can cost up to €130,000 for project set-up in the first two years, then €40,000 every five years⁴. This does not include payments to all the experts and consultants involved in the different stages of project implementation. While we see an insistence on the profitability of this type of mechanism, the full costs amount to hundreds of thousands of euros, most of which go to other entities rather than farmers. Given the cost of this process, and even in the unexpected circumstance of the price of soil carbon reaching and maintaining a rate of €100 per tonne, it is highly questionable whether this market would one day be profitable.

² Mutualité Sociale Agricole Française, 2021 <https://www.msa.fr/lfp/presse/prevention-suicide-populations-agricoles>

³ <https://www.etcgroup.org/who-will-control>

⁴ COWI, Ecologic Institute and IPEE (2021) Technical guidance handbook – Setting up and implementing result-based carbon farming mechanisms in the EU Report to the European Commission, DG Climate Action, as part of contract no. CLIMA/C.3/ETU/2018/007. COWI, Kongens Lyngby. P 50



- **There is scientific consensus, including in the IPCC's latest report, that carbon sequestration in land is unreliable because of impermanence and carbon reversibility.**
 - o CO2 emissions remain in the atmosphere for several hundred or thousand years. To really offset these emissions, it would be necessary to ensure that the carbon in question remains sequestered for the same period of time. However, that is impossible: the projects are designed to last for five to ten years or a maximum of 25 years. The impermanence of carbon in these schemes completely negates the viability of the Commission's carbon removal framework.

- **As announced in the Sustainable Carbon Cycle communication⁵, there is a proven risk that this certification mechanism will lead the way to generalising a highly questionable carbon market for agriculture, and any inclination towards this must be stopped**
 - o REDD+, the global carbon crediting system for forests, is a disastrous example of how carbon crediting and carbon markets applied to land have provoked land grabbing through expropriation and violation of the rights of indigenous people and peasants without slowing deforestation in the least⁶. In Europe, a carbon market on agricultural land would undoubtedly also lead to even more land grabbing as financial and corporate interests will be keen to profit from the opportunity. The issue with land intense concentration, especially in recent years, is already all too real in Europe and in a context of the ageing population of European farmers, it is extremely difficult for youth to access land.
 - o The carbon market does not work as it simply leads to carbon leakage, which occurs when an agent implements virtuous practices in one place but moves its non-virtuous activities somewhere else.
 - o The high levels of volatility in the price of land-based carbon in carbon market makes it anything but a stable revenue for farmers.⁷
 - o Instead of unpredictable, volatile and unregulated carbon markets, it is the Common Agricultural Policy (CAP) that must be used to enhance good practices and food systems in a coherent and holistic manner. It should support small-scale farmers and agroecological and meaningful practices, which is truly lacking in the CAP reform and the National Strategic Plans that have been unveiled so far. It is not enough to say "farmers must change" when the WTO regulations have pushed farmers to go towards

⁵ COM(2021) 800

⁶ Juan Pablo Sarmiento Barletti and Anne M. Larson, "Rights abuse allegations in the context of REDD+ readiness and implementation", CIFOR Info Brief, no. 190, 2017.

⁷ A recent example of the volatility of these prices is the crash in carbon prices in the ETS due to the war in Ukraine in February 2022. Cf. https://www.theguardian.com/environment/2022/mar/02/eu-carbon-permit-prices-crash-after-russian-invasion-of-ukraine?CMP=Share_AndroidApp_Other



more intensive and industrial practices; farmers must be concretely supported through this transition.

After this analysis, we conclude that the economic cost of the announced certification is enormous and its impacts seem not only useless but directly detrimental. Why isn't the EU instead making the choice to use valuable public funds and resources to support a coherent, holistic and stable farms and food system transition? Our demands are as follows:

- Rather than investing time and energy in carbon crediting for land, **the EU should invest in working towards the objectives** of the European Green Deal and the Farm to Fork Strategy. They must lead to profound changes in agricultural and food policies that enable farmers to undertake a transition to an agroecological and sustainable food system, and support those that are already thriving in it. This is the most effective way to fight climate change.
- We call for the urgent transition away from **industrial intensive models of agricultural and livestock production**, which are the primary sources of agricultural greenhouse gases. We ask you to intervene against and regulate food speculation; to stop free trade agreements, ensuring that no damage is caused to citizens on other continents including farmers. The EU should simultaneously work on enabling the EU internal and national markets. In addition, we ask you to direct public policy and finance to supporting territorial food systems and short supply chains with a focus on food justice and solidarity with the rest of the world. We call on you to support training on agroecology⁸, ensuring access to land for young farmers that struggle to start up in the profession.
- **We demand an end to the rush for data grabbing by private interests** and investors. Farmers neither need nor want their knowledge about their territories and life in the hands of corporations.
- **We demand you work on a land directive that would enable the redistribution of land** to smaller and more sustainable farms, to youth and new entrants.

Yours sincerely

Mr Attila Szocs, Mrs Morgan Ody, Mr Andoni Garcia, farmers and ECVC Coordinating Committee members

With the endorsement of :

- Friends of the Earth Europe
- IATP - Institute for Agriculture and Trade Policy
- CEO - Corporate Europe Observatory
- FIAN Belgium
- CCFD – Terre Solidaire

⁸ Agroecology must be understood in its complexity. It is not only about good practices, but about ecologic, economic and social aspect, from producers to eaters.