



Agroecology Europe Position on Certification on Carbon removals

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Agroecology Europe, the European association promoting agroecology as a set of practices, a science and a movement across Europe, welcomes the opportunity to give feedback on the Commission's legislative revision on the carbon removal certification framework.

Soil is one of the largest reservoirs of carbon, along with the ocean. Yet, 75% of agricultural soils are already degraded to different degrees due to human activity¹. As a result of the intense use of heavy machinery and synthetic fertilizers, the mineralization of soils in arable fields has depleted soil carbon stocks. This degradation undermines the resilience of our food systems to climate change and threatens our ability to feed ourselves in the long term.

To achieve the objectives of the European Green Deal and the European Climate Law, a redesign of the farming and food systems following the agroecological principles is necessary. This can simultaneously reduce the GHG emissions, increase the sequestration of carbon in soils and increase the proportion of biomass replacing fossil fuels².

Agroecology provides a relevant framework for transforming farming and food systems to meet these objectives as well as the environmental, social and economic sustainability of the sector. Indeed, agroecological practices allow not only to store more carbon in the soil, but also to improve its fertility, increase resistance to erosion and capacity to retain water. The latest IPCC report states that agroecological farming and agroforestry can increase resilience, productivity and sustainability of both natural and food systems under climate change. The report also mentions that “*ecosystem-based approaches, agroecology and other nature-based solutions have the potential to strengthen the resilience to climate change with multiple co-benefits*”³.

In this statement, *Agroecology Europe* recalls the importance of anchoring public farming and food policies in an ambitious framework that is coherent with the various objectives set out in the Farm to Fork Strategy and that enables to strengthen the farmers rights and livelihoods.

¹ FAO. 2021. *The State of the World's Land and Water Resources for Food and Agriculture – Systems at breaking point*. Synthesis report 2021. Rome

² Aubert, P.-M., Fouchderot, C., Svensson, J., (2022). *Design principles of a Carbon Farming Scheme in support of the Farm2Fork & FitFor55 objectives*. IDDRI, Policy Brief N°01/22

³ IPCC, 2022: *Climate Change 2022: Impacts, Adaptation, and Vulnerability*. Contribution of Working Group II to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change [H.-O. Pörtner, D.C. Roberts, M. Tignor, E.S. Poloczanska, K. Mintenbeck, A. Alegría, M. Craig, S. Langsdorf, S. Lösschke, V. Möller, A. Okem, B. Rama (eds.)]. Cambridge University Press.

If the objective to drastically reduce GHG emissions and to make agriculture the best ally and beneficiary of a carbon neutrality strategy at the EU and global level is a key priority, it is also necessary to take into account the social and economic realities and complexities of the European agricultural sector, particularly on the issues of the right to access to land, and to make environmental, social and economical sustainability a reality for EU farmers.

Remunerating European producers for the ecosystem services they are providing through virtuous practices - preservation of biodiversity, natural resources, carbon storage in their soils - can be an effective way to scale agroecology up and out. Nevertheless, it is important to define coherent and efficient policy measures that all point towards a systemic redesign of European farming and food systems.

Agroecology: the best ally for a low carbon emission strategy in the EU

Agroecology, understood as the ecology of food systems⁴ (Francis et al. 2003) entails key ecological principles: biomass recycling, strengthening of resilience through ecological pest and disease management, enhancing favorable soil conditions for plant growth, minimizing losses of resources, promoting diversification at species and genetic scales, and enhancing of synergies and biological interactions⁵.

Introducing agroecological practices⁶ such as the generalization of intermediate crops, no-till practices, the establishment of intercrops (sown at the same time as the main crop) and plant cover to enrich the soil are priorities to rebuild carbon stocks. Moreover, the development of agroforestry, the planting of hedges, the development of temporary grasslands and intermediate crops between two harvests, as well as the addition of organic matter to the soil, such as manure or compost are also key practices that can improve the carbon sequestration⁷ and that should therefore be generalized and encouraged in the framework of the carbon farming initiative.

A carbon market approach might lead to trade-offs and can put at risks farmers livelihoods

Carbon sequestration is one of the co-benefits resulting from the implementation of agroecological practices. It is an absolute priority to support the adoption of those virtuous practices **in a systemic and long term approach** at the farm level, but also at the territorial level and within food value chains.

⁴ C. Francis, G. Lieblein, S. Gliessman, T. A. Breland, N. Creamer, R. Harwood, L. Salomonsson, J. Helenius, D. Rickerl, R. Salvador, M. Wiedenhoef, S. Simmons, P. Allen, M. Altieri, C. Flora & R. Poincelot (2003) Agroecology: The Ecology of Food Systems, *Journal of Sustainable Agriculture*, 22:3, 99-118

⁵ Dumont, A.M., Wartenberg, A.C. & Baret, P.V. (2021). Bridging the gap between the agroecological ideal and its implementation into practice. A review. *Agron. Sustain. Dev.* 41, 32 (2021)

⁶ Wezel, A. & Casagrande, Marion & Celette, Florian & Jean-François, Vian & Ferrer, Aurelie & Peigné, Joséphine. (2014). Agroecological practices for sustainable agriculture. A review. *Agronomy for Sustainable Development*. 34. 1-20.

⁷ Pellerin, S. & Bamière, L. & Launay, C. & Martin, R. & Angers, D. & Balesdent, J. & Basile-Doelsch, I. & Bellassen, V. & Cardinael, R. & Cécillon, L. & Ceschia, E. & Chenu, C. & Constantin, J. & Darroussin, J. & Delacote, P. & Delame, N. & Gastal, F. & Gilbert, D. & Schiavo, M. (2019). Stocker du carbone dans les sols français, Quel potentiel au regard de l'objectif de 4 pour 1000 et à quel coût ? Synthèse du rapport d'étude, INRA (France).

Therefore, we believe that a market-based approach policy, with its limited scope, cannot by itself express the full potential of the agricultural and food sector to regenerate ecosystems and contribute to respecting planetary boundaries. This siloed approach might even contain risks that may undermine farmers' rights, especially regarding access to land.

The increase in land value induced by a carbon market might lead to a greater pressure on European land prices. Land speculation and land grabbing might be reinforced and prevent farmers, and in particular newcomers and young people willing to enter the farming sector from accessing land ownership.

Moreover, the high volatility of carbon prices might create additional economic uncertainties for farmers who already suffer from significant income variability ⁸.

Finally, the high variability of carbon sequestered depending on soil type and biomass type makes the monitoring and assessment in a simple, accurate and reliable way extremely difficult and costly.

Agroecology Europe is at the disposal for any request from the Commission and would be pleased to offer the expertise in this process of elaboration of this legislative revision.

For further information, please contact our Secretariat:

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⁸ European Commission (2021) EU Farm Economics Overview, based on FADN 2018