

Environmental Defense Fund Europe (EDFE) – Response to European Commission Consultation on the EU Livestock Strategy

Background

The European Commission’s “Vision for Agriculture and Food” highlights the livestock sector as central to EU agriculture, competitiveness, environmental conservation and rural vitality. Its livestock workstream focuses on reducing climate and environmental impacts, fostering investment, innovation, and technological advancements, and promoting sustainable production models, with an emphasis on targeted territorial solutions.

The EU livestock strategy must build on these priorities while increasing ambition on the role of the sector in meeting the EU’s climate targets. Livestock accounts for 65% of the EU’s agricultural emissions, mainly methane and nitrous oxide from enteric fermentation and manure management¹. Despite the range of mitigation options available to reduce the sector’s emissions, non-CO₂ emissions from agriculture remained relatively stable over the last decades (2005-2021)². This highlights the importance of a strong on-farm business case and points to the role of capacity building and knowledge sharing through diverse channels. With agriculture projected to become the EU’s largest emitting sector by 2040³, business as usual is incompatible with the 2050 climate neutrality target and an undesirable pathway for farmers facing increasing challenges.

EDFE recommendations for the EU livestock strategy

1. **Anchor the livestock strategy in an enabling agricultural policy framework.** The strategy should empower farmers to deliver food security, viable rural livelihoods, and climate and environmental objectives simultaneously—rather than treating these goals as trade-offs.
2. **Move from siloed measures to an integrated, farm-level approach.** Policy design should strengthen the on-farm business case for sustainable practices and recognise the

¹ European Environment Agency (2024). Greenhouse gas emissions from agriculture in Europe. Available at: <https://www.eea.europa.eu/en/analysis/indicators/greenhouse-gas-emissions-from-agriculture?activeAccordion=546a7c35-9188-4d23-94ee-005d97c26f2b>

² European Commission (2023). Climate Action Progress Report 2023: Shifting gears: Increasing the pace of progress towards a green and prosperous future. Available at: https://climate.ec.europa.eu/document/download/107ec73a-8cab-4a37-bd21-23e86ba47be4_en?filename=com_2023_653_glossy_en.pdf

³ European Commission (ed.) (2024). Impact Assessment Report, Accompanying the document “Communication from the Commission to the EU. Securing our future Europe’s 2040 climate target and path to climate neutrality by 2050 building a sustainable, just and prosperous society”. Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52024SC0063>

diversity of livestock systems, from extensive grazing to intensive production, with tailored support for each.

3. **Enhance capacity building and farmers' advisory services through the Common Agricultural Policy (CAP).** Resources should be available for CAP Managing Authorities, farmers and farm advisors to be informed concerning emission reduction technologies and their implementation at the farm level.
4. **Align public and private funding to turn ambition into action.** EU and national funding instruments—particularly the CAP and the Carbon Removals and Carbon Farming Regulation—must be better coordinated to drive implementation at farm level.
5. **Use public-private catalysts to crowd in investment.** Instruments such as European Investment Bank financing can play a key role in aligning funding streams and reducing risk for farmers and investors.
6. **Leverage corporate commitments and supply-chain initiatives.** Existing corporate sustainability actions are an underused lever and should be actively aligned with public funding frameworks to avoid duplication and maximise impact.
7. **Embed inclusiveness from the outset.** The strategy should be developed through a participatory process to ensure it is both ambitious and implementable in practice.

Deploying the CAP's potential to drive emission reductions in the sector

The CAP remains the main EU policy instrument with the potential to drive climate mitigation action in the agricultural sector. Yet, evidence suggests that the current 2023-2027 CAP will deliver no meaningful reduction of livestock-related emissions⁴. The current CAP Strategic Plans provide limited and insufficiently targeted incentives to address the main sources of agricultural emissions, particularly enteric methane from livestock and manure management. Business as usual is no longer working for farmers, the food system, or European citizens⁵.

A modernised CAP can empower farmers and agri-food actors to lead the transition to a more resilient, competitive, and sustainable food system. A study developed by EDFE, Ecologic and the Institute for European Environmental Policy titled [“Leveraging the Common Agricultural Policy to accelerate livestock emission reductions: case studies from five Member States” \(2025\)](#) provides a valuable contribution to envisage a more climate-ambitious CAP. The study characterises the livestock sector in five Member States and identifies key challenges for farmers and CAP Managing Authorities to realise GHG emission reductions in the sector. Additionally, the study analyses mitigation options for reducing GHG emissions and identifies CAP interventions which can contribute towards EU climate goals, concluding with actionable recommendations to untap the sector's mitigation potential. Based on these findings, EDFE recommends:

⁴ European Commission (2024). Estimating the climate change mitigation potential of CAP Strategic Plans. Available at: https://agriculture.ec.europa.eu/media/news/estimating-climate-change-mitigation-potential-cap-strategic-plans-2024-11-22_en

⁵ European Commission (2024). Estimating the climate change mitigation potential of CAP Strategic Plans. Available at: https://agriculture.ec.europa.eu/media/news/estimating-climate-change-mitigation-potential-cap-strategic-plans-2024-11-22_en

Scheid A, Hart K, Pasmينو J, Riedel A, Tremblay L-I, Durrant L (2025). Leveraging the Common Agricultural Policy to accelerate livestock emission reductions – examples from five Member States. Environmental Defense Fund, Ecologic Institute and IEEP. Available at: <https://www.ecologic.eu/sites/default/files/publication/2025/Leveraging-the-Common-Agricultural-Policy-LR.pdf>

- Setting out clear intervention logics at national level to reduce livestock GHG emissions, which target both intensive and extensive production systems and consider science-based technological solutions.
- Providing financial support to implement on-farm mitigation measures through eco-schemes and agri-environmental-climate interventions, as well as direct support for high upfront investment costs associated with some interventions (e.g. slurry covers and biogas plants for anaerobic manure digestion) via the upcoming CAP revision and the Member States CAP Strategic Plans.
- Enhancing the attention and resources available for capacity building targeting CAP Managing Authorities, farmers and farm advisors, concerning state-of-the-art technologies, their mitigation potential and practical examples to incorporate those innovations in CAP interventions and implement them on the ground. This includes funding knowledge platforms such as research centres, demonstration farms, Agricultural Knowledge and Innovation Systems, and public agricultural events; promoting user-friendly, trusted farm tools that integrate economic and sustainability indicators; and implementing interventions focusing on knowledge exchange and information-sharing.
- Introducing fully CAP-funded, farm-specific environmental and climate plans that improve the effectiveness of long-term environmental payments by providing advisory services, training, innovation, and practical support.
- Strengthening farmer networks and promoting close collaboration between agricultural authorities, farm advisors, and farmers to build trust and a strong sense of community.
- Ensuring coherence of the EU livestock strategy and the (current and future) CAP with other climate policies involving different value chain actors to untap the mitigation potential of the sector, enhancing its contribution towards climate neutrality and leveraging synergies to deliver multiple policy objectives.

Mobilising private financing and the Carbon Removals and Carbon Farming Regulation

There is a clear gap in the financing of GHG emission measures in the livestock sector, which requires leveraging private funding through a whole value chain approach and creating attractive business cases for private sector investment into low-emission livestock systems. In this context, EDFE recommends the following action points:

- Applying public funding tools to reduce investment risk and mobilise greater private finance for investments into emission reduction measures. The alignment of private financing with public goals can increase farmer access to private funding in various forms, such as blended finance, equity and debt. It is important to ensure that all farmers, regardless of size or location, can access the required financing for emerging technologies that improve productivity and contribute to EU climate targets.
- Including livestock emission reductions within the CRCF Regulation. If well-designed with robust, science-based methodologies and market rules capable of genuinely catalysing demand for high-integrity credits, CRCF could serve as a meaningful economic incentive to farmers and other value chain actors to untap the mitigation potential of the livestock sector by creating an attractive business case for the implementation of emission reduction measures.

Inclusive process

The European Commission should ensure that the development of the EU livestock strategy is grounded in a broad, inclusive and transparent process. Decisions shaping the sector must draw on a diverse range of perspectives and expertise, including farmers and other representatives along the value chain as well as environmental groups and civil society at large. Balanced representation is a prerequisite for effective policy. Strategies developed through meaningful multi-stakeholder dialogue are more likely to reflect real-world trade-offs, achieve stronger buy-in from all parties, and ultimately lead to smoother implementation on the ground.