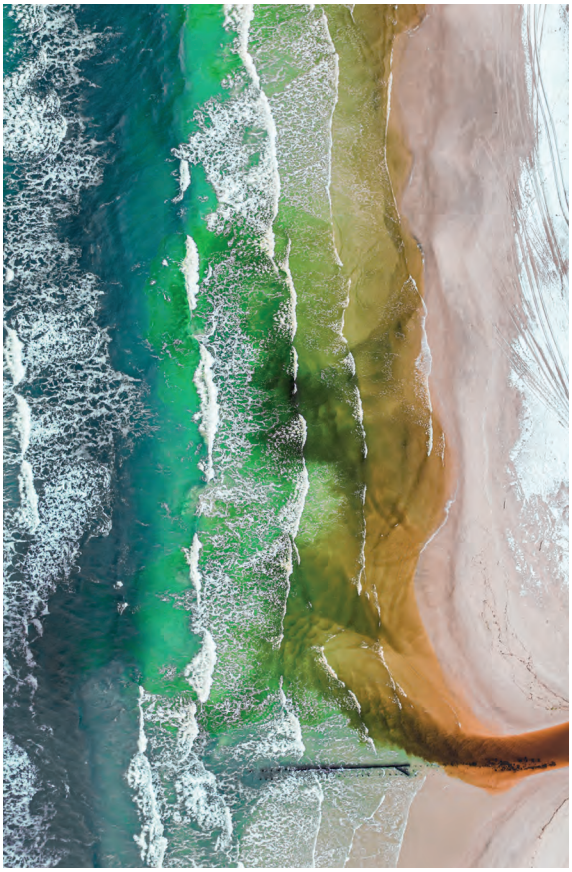
Agricultural Exceptionalism in EU Environmental Law:

The Under-Regulation of Greenhouse Gas Emissions in Animal Agriculture

RESEARCH NOTE #8 — Alice Di Concetto, Gabriela Kubíková, Anatole Poinsot



Waste streams flowing into the Baltic Sea. © Jacek Nowak

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ACHIEVING BETTER TREATMENT FOR ANIMALS

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ACHIEVING BETTER TREATMENT FOR ANIMALS

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Introduction

Animal agriculture constitutes a significant source of greenhouse gas emissions, accounting for 54% of anthropogenic methane emissions. Animal agriculture also produces 94% of ammonia emissions, with ammonia itself classified as an indirect greenhouse gas.[1] At global level, animal agriculture emits 14.5% of all anthropogenic greenhouse gas emissions.[2] In the EU, animal agriculture generates 70% of greenhouse gas emissions in the agricultural sector.[3] More than half of greenhouse gas emissions in animal agriculture are generated by animals, through enteric fermentation and manure, with the rest originating from animal feed production and land use for animal-source food production.[4]

Animal agriculture is also a driver of biodiversity loss, soil degradation, and water pollution.[5] Environmental scientists have also found that animal agriculture contributes to climate change more than any other human activity.[6] These negative environmental externalities are aggravated by the excessive production volumes of animal-source products, which have increased exponentially since the 1950s in the EU, where industrial farm animal production is now ubiquitous and constitutes the dominant model of food production. As a result, the EU is now the world's largest milk producer,[7] and is one of the world's top meat producers,[8] in addition to being the second largest pork producer and the third largest beef producer.[9]

Over the past two decades, the EU has adopted policy and regulatory instruments that aim to redress this situation. To comply with its obligations under international law, particularly the Paris Agreement,[10] the EU executive eventually attempted to impose reduction targets in the agri-food sector. To that end, the European Commission made a series of reform announcements in the form of policy documents in 2020. However, five years later, these attempts have largely failed to translate into regulatory actions. Instead, the EU institutions have persisted in the traditional expression of agricultural exceptionalism in the law, characterized by a weak, inconsistent, sectoral regulatory approach, even in the context of climate change and adaptation policies. As a result, animal agriculture is one of the least regulated industries in the EU, including from an environmental perspective.

This research note examines the policy and regulatory instruments currently in place to limit and regulate greenhouse gas emissions from animal agriculture in the EU. It further identifies the limitations of these instruments and advances reform proposals to strengthen the effectiveness of the EU's regulatory framework.[11]

1 Laure Malherbe, et al., Report 2022/21: *Emissions of Ammonia and Methane from the Agricultural Sector*. Emissions from Livestock Farming (2023)

2 FAO, *Livestock's Long Shadow*. Environmental Issues and Options (2006)

3 Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions, A Farm-to-Fork Strategy for a Fair, Healthy and Environmentally-Friendly Food System, COM/2020/381 final, p.7

4 I4CE, Politiques alimentaires et climat : une revue de la littérature (2019)

5 Tim G. Benton et al., *Food System Impacts on Biodiversity Loss*, Chatham House, The Royal Institute of International Affairs (2021)

6 Gerard Wedderburn-Bisshop, *Increased Transparency in Accounting Conventions Could Benefit Climate Policy*, Environmental Research Letters (2025).

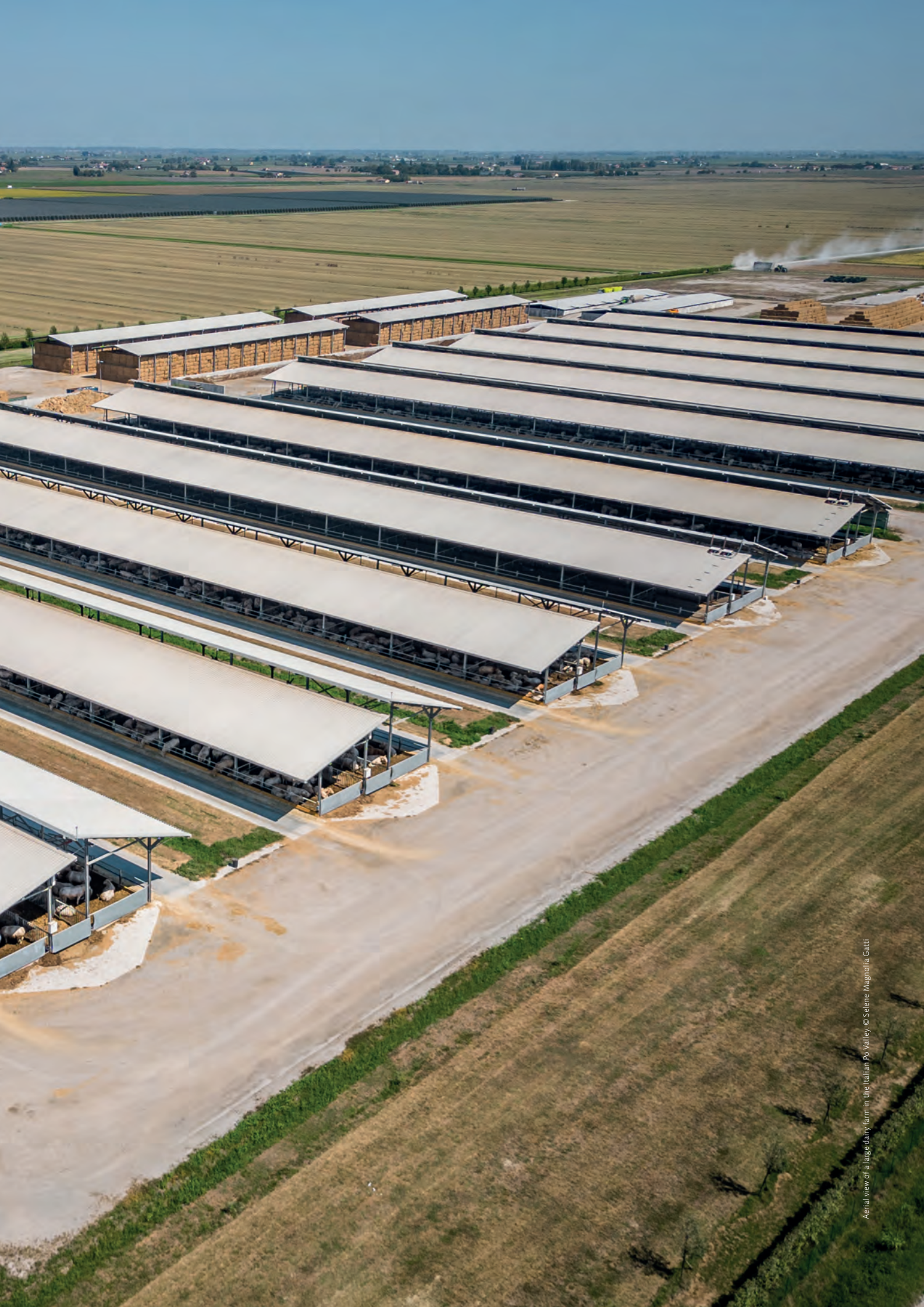
7 European Parliamentary Research Service, The EU Dairy Sector: Main Features, Challenges and Prospects (2024)

8 European Commission, "Pork," https://agriculture.ec.europa.eu/farming/animal-products/pork_en (last accessed April 3rd, 2025).

9 European Parliament, European Union Beef Sector: Main Features, Challenges and Prospects (2024)

10 2016 UN Framework Convention on Climate Change, Paris Agreement, OJ L 282, 19.10.2016, p. 4–18.

11 The analysis presented in this research note is based on a presentation entitled, "The Regulation of Greenhouse Gas Emissions in EU Animal Agriculture: Moving Away from a Sectoral Regulatory Approach," delivered by Alice Di Concetto at the symposium, "Reducing Agricultural Greenhouse Gas Emissions and the Role of Law," organized by Tilburg University. The symposium was held at the Royal Netherlands Academy of Arts and Sciences in Amsterdam on December 7th, 2023, under the direction of Professor Jonathan Verschuuren (Tilburg University).



Aerial view of a large dairy farm in the Italian Po Valley. © Selene Magnolia Gatti

1. Policy Discourse and Regulatory Action

1.1. A Wealth of Policies, Yet Few Regulatory Actions

At the outset of the 2020s, the European Commission adopted a series of policies, starting with the 2020 EU Strategy to Reduce Methane Emissions, promptly followed that same year by a policy document called the Farm-to-Fork Strategy. The subsequent Fit for 55 Package was adopted in 2021. Each of the policies presented in these strategy documents share a common goal: to contribute to the achievement of climate neutrality in the EU by 2050, consistent with the objective to adopt binding targets in the reduction of greenhouse gas emissions announced by the Commission in the European Green Deal.[12]

1.1.1. THE EU STRATEGY TO REDUCE METHANE EMISSIONS (2020)

The Communication on an EU Strategy to Reduce Methane Emissions (Methane Strategy) was published on October 14th, 2020.[13] While the Methane Strategy did not include any regulatory action to reduce methane emissions in the agricultural sector, it did include policy measures that aim to reduce such emissions, including the creation of an expert group to collect and analyze methane emissions data, particularly emissions from animal agriculture.[14] Another policy initiative was the promotion of innovative methane emissions mitigation measures, which sought to reduce methane from enteric fermentation.[15]

1.1.2. THE FARM-TO-FORK STRATEGY (2020)

In December 2019, the then newly-appointed European Commission presented the European Green Deal,[16] a document that presented the European Commission's work program for the following five years (until 2024). The European Green Deal sought to implement the United Nations' Sustainable Development Goals and the 2015 Paris Agreement into EU legislation, with an emphasis on achieving climate neutrality in Europe by 2050.[17] The European Green Deal thus covered a large array of policy areas, including food policy, which was specifically covered in the Farm-to-Fork Strategy.[18]

Like the Methane Strategy, Farm-to-Fork also includes several references and actions related to methane and nitrogen emissions from agriculture, especially regarding:

- **Nitrogen:** The European Commission recognizes that "the excess of nutrients (especially nitrogen and phosphorus) in the environment, stemming from excess use and the fact that not all nutrients used in

12 European Commission, Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions, The European Green Deal COM/2019/640 final, available online: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=COM%3A2019%3A640%3AFIN.

13 European Commission, Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on an EU Strategy to Reduce Methane Emissions, COM/2020/663 final, available online: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:52020DC0663

14 *Ibid*., p. 5.

15 *Ibid*., p. 3.

16 Communication from the Commission on the Green Deal, COM(2019) 640 final, available online: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52019DC0640

17 Article 4(1) of the Paris Agreement further sets a global climate neutrality goal to be achieved "'in the second half of this century."

18 Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions, A Farm-to-Fork Strategy for a Fair, Healthy and Environmentally-Friendly Food System, COM/2020/381 final, available online: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:52020DC0381

agriculture are effectively absorbed by plants, is another major source of air, soil and water pollution and climate impacts."[19]

- **Methane and Nitrogen:** The Commission also recognized that "agriculture is responsible for 10.3% of the EU's greenhouse gas (GHG) emissions and nearly 70% of those come from the animal sector. They consist of non-CO2 GHG (methane and nitrous oxide)."[20]

The Commission further announced measures to reduce nitrogen and methane emissions, including the development of "an action plan to address nutrient pollution at source and increase the sustainability of the livestock sector,"[21] and the review of the "EU promotion programme for agricultural products, with a view to enhancing its contribution to sustainable production and consumption, and in line with the evolving diets."[22]

However, the revision of the EU promotion program for agricultural products never took place, and a large proportion of its budget is still allocated to the promotion of animal-source products. Over the period 2020–2024, more than 33% of the program's budget was dedicated to the promotion of meat, dairy, and eggs. Additionally, around 19% of the budget was allocated for the promotion of mixed "baskets" of products, which included meat and dairy products.[23] Of 380 campaigns funded between 2020 and 2024, 194 promoted animal-source products, totaling over €415 million. These figures confirm trends from the 2016–2020 funding period,[24] indicating that the selection criteria did not change significantly between 2016 and 2024, which contradicts the stated objective of the Farm to Fork Strategy[25] to promote more sustainable diets. In 2025, the Commission did not amend product eligibility rules for promotion programs, suggesting that the allocation of these funds is likely to remain unchanged.[26]

19 *Ibid*., p. 6.

20 *Ibid*., p. 7.

21 *Ibid*.

22 *Ibid*.

23 Lists of selected programs available on : European Research Executive Agency, Calls for Proposals – Promotion of Agricultural Products, European Commission, available online at: (last accessed on 28 april 2025). https://rea.ec.europa.eu/funding-and-grants/promotion-agricultural-products-o/calls-proposals-promotion-agricultural-products_en.

24 Greenpeace, Marketing Meat: How EU Promotion Policies Lock in Unsustainable Consumption, 2021 available online: https://www.greenpeace.org/static/planet4-eu-unit-stateless/2021/04/20210408-Greenpeace-report-Marketing-Meat.pdf

25 Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions, A Farm-to-Fork Strategy for a Fair, Healthy and Environmentally-Friendly Food System, COM/2020/381 final, available online: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52020DC0381

26 Annex I, Commission implementing decision on the financing of information provision and promotion measures concerning agricultural products implemented in the internal market and in third countries and the adoption of the work programme for 2025, COM/2024/8679 final, available online: https://webgate.ec.europa.eu/circabc-ewpp/d/d/workspace/SpacesStore/cd218792-1820-4ecb-87bc-0519de78e672/file.bin

Table 1: Assessment of announced regulatory actions in the Farm-to-Fork Strategy

Announced in the Farm-to-Fork Strategy	**Achievements**
"Develop with Member States an integrated nutrient management action plan to address nutrient pollution at source and increase the sustainability of the livestock sector" and the extension of "the application of precise fertilization techniques and sustainable agricultural practices, notably in hotspot areas of intensive livestock farming and of recycling of organic waste into renewable fertilizers" through the Common Agricultural Policy regulations (CAP).	The Nutrient Action Plan for Better Management went through public consultation and was scheduled for adoption at the end of the second quarter of 2023. However, the Commission never adopted the plan.
"Review of the EU promotion programme for agricultural products, with a view to enhancing its contribution to sustainable production and consumption, and in line with the evolving diets."	The review was slated to be conducted by the end of 2020, but is currently blocked on account of "lack of consensus within the Commission" regarding maintaining or excluding red/processed meat from the scope of the promotion policy.[29] The revision of the EU promotion programme for agricultural products never took place and a large proportion of the budget is still allocated to the promotion of animal products.

Similarly, the Integrated Nutrients Management Action Plan was submitted for public consultation in 2022 and slated for adoption in 2023.[27] However, the European Commission ultimately did not adopt the plan.[28]

1.1.3. THE FIT FOR 55 PACKAGE (2021)

Following the EU Strategy to Reduce Methane Emissions, the European Commission published a new policy document in July 2021 called "Adjusting to Target 55: Reaching the EU's 2030 climate target on the road to climate neutrality" ("Fit for 55 Package") in the energy, fuels, transport, buildings, land use, and forestry sectors.[30] The Fit for 55 Package covers all greenhouse emissions, and although the strategy does not explicitly mention methane or nitrogen emissions, these two forms of emissions are covered in its scope.

The Fit for 55 Package announced three main regulatory actions in the field of agriculture, which the European Commission implemented, as follows:

However the current regulatory framework was only affected superficially by these reforms and did not result in significant change in the regulation of GHG emissions in animal agriculture.

1.1.4. THE STRATEGIC DIALOGUE ON THE FUTURE OF EU AGRICULTURE (2024) AND THE VISION FOR AGRICULTURE AND FOOD (2025)

In September 2023, the President of the European Commission Ursula von der Leyen created an official forum gathering selected members

27 European Commission, Nutrients – action plan for better management, available online: https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12899-Nutrients-action-plan-for-better-management_en.

28 European Environmental Bureau (EEB), Letter to the European Commission on the Integrated Nutrient Management Action Plan (INMAP), September 2023, available online: https://eeb.org/wp-content/uploads/2023/09/Letter-to-COM-re-INMAP_Sept-2023-FINAL.pdf

29 According to a document leaked from the Commission in 2023.

30 Communication From the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions "Fit for 55": Delivering the EU's 2030 Climate Target on the Way to Climate Neutrality, Com/2021/550 final, available online: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52021DC0550

Table 2: Assessment of announced regulatory actions in the Fit for 55 Package

Announced in the Fit for 55 Package	Achievements
New carbon adjustment mechanism at the EU borders, including for nitrogen dioxide-emitting fertilizers	Adopted (Regulation 2023/956 Establishing a Carbon Border Adjustment Mechanism)
Update of the Effort Sharing Regulation	Revised (Regulation 2018/842 on Binding Annual Greenhouse Gas Emission Reductions by Member States From 2021 to 2030 Contributing to Climate Action to Meet Commitments Under the Paris Agreement)
Update of the LULUCF Regulation	Revised (Regulation 2018/841 on the Inclusion of Greenhouse Gas Emissions and Removals From Land Use, Land-Use Change and Forestry in the 2030 Climate and Energy Policy Framework) and further amended in 2023 (Regulation 2023/839 amending Regulation (EU) 2018/841 as regards the scope, simplifying the reporting and compliance rules, and setting out the targets of the Member States for 2030, and Regulation (EU) 2018/1999 as regards improvement in monitoring, reporting, tracking of progress and review.)

from civil society organizations and the private agricultural sector to discuss EU agri-food policy orientations. This group was called the "Strategic Dialogue on the Future of EU Agriculture,"[31] and its members drafted a final report published in September 2024, endorsed by the European Commission. While the authors acknowledge that "some practices" in agriculture lead to greenhouse gas emissions and negatively impact biodiversity, soil, air, or water use, the report only includes vague and general recommendations for "reconciling agriculture with nature." For instance, the authors of the report recommend the European Commission explore supporting mixed- and high-welfare farms, and they further call for the Commission to develop a strategy on the "key role of animal farming." The authors also mention the possibility of encouraging higher consumption of plant-based proteins as a way to reduce the impact of food systems on the environment, and they additionally call on the Commission to develop an EU Action Plan for Plant-Based Foods. Lastly, the authors suggest the creation of a "just transition fund," which might be relevant in supporting protein transition, as well as the creation of Emissions Trading Schemes for agricultural production.[32]

In February 2025, after the new EU administration took office, the European Commission published its policy program for the 2025–2029 term in the field of agriculture, called "A Vision for Agriculture and Food."[33] While acknowledging the need to make the agri-food sector more sustainable, the "Vision" document also insists on the existence of "economic and implementation challenges" and competitiveness goals. The Commission further announced specific policy actions on the issue of livestock production, aiming to "seek ways to address its climate/environment footprint, including ways to valorize the link between livestock production and maintenance of environment- and climate-valuable grasslands through more extensive livestock systems beneficial to the preservation of biodiversity and landscape seek ways to address its climate/environmental footprint."[34] Unlike the 2020 Farm-to-Fork Strategy, the Vision document lacks clarity in policy actions and goals, thus undermining the need for stronger regulation of greenhouse gas emissions in EU animal agriculture.

1.2. Current Regulatory Framework

Greenhouse gas emissions in EU animal agriculture are regulated by five main statutes:

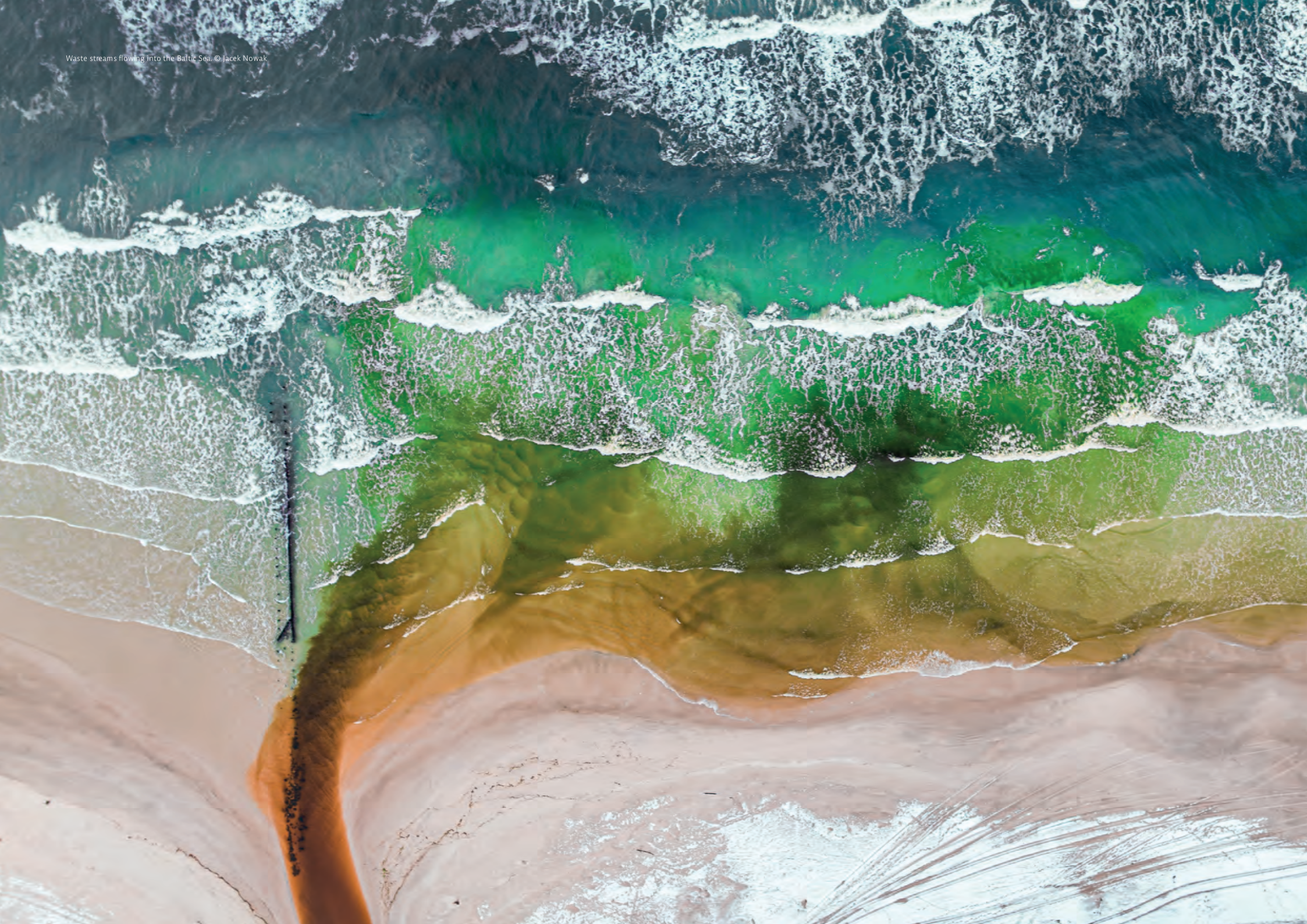
1. The European Climate Law (Regulation 2021/1119 Establishing the Framework for Achieving Climate Neutrality, OJ L 243, 9.7.2021, p. 1–17)
2. The Effort Sharing Regulation (Regulation 2018/842 on binding annual greenhouse gas emission reductions by Member States from 2021 to 2030 contributing to climate action to meet commitments under the Paris Agreement, OJ L 156, 19.6.2018, p. 26–42)
3. The LULUCF Regulation (Regulation 2018/841 on the inclusion of greenhouse gas emissions and removals from land use, land use change and forestry in the 2030 climate and energy framework OJ L 156, 19.6.2018, p. 1–25)

31 European Commission (2024). Strategic Dialogue on the Future of EU Agriculture: A shared prospect for farming and food in Europe. Available at: https://agriculture.ec.europa.eu/overview-vision-agriculture-food/main-initiatives-strategic-dialogue-future-eu-agriculture_en (last accessed 3 April 2025).

32 See *infra*.

33 Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions: A Vision for Agriculture and Food, COM(2025) 75 final.

34 Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions: A Vision for Agriculture and Food, COM(2025) 75 final, p.16.



Waste streams flowing into the Baltic Sea. © Jacek Nowak

4. The Industrial Emissions Directive (Directive 2010/75/EU on industrial emissions, OJ L 334, 17.12.2010, p. 17–119)
5. The Nitrates Directive (Council Directive 91/676 concerning the protection of waters against pollution caused by nitrates from agricultural sources OJ L 375, 31.12.1991, p. 1–8)

These statutes generally fail to produce any tangible effects in mitigating greenhouse gas emissions in animal agriculture for two reasons:

- Scope: The statutes that regulate greenhouse gas emissions the strictest almost always exclude animal agriculture from their scope.
- Limited rules: When the scope does include animal agriculture, rules that aim to reduce greenhouse gas emissions in agriculture suffer from significant limitations.

1.2.1. THE EUROPEAN CLIMATE LAW, THE EMISSIONS TRADING SYSTEMS DIRECTIVE, THE LULUCF REGULATION, AND THE EFFORT SHARING REGULATION

More specifically, the European Climate Law codifies the Paris Agreement into EU law and sets reduction targets to be achieved by the EU (notably, greenhouse gas neutrality by 2050 and 55% reduction target by 2030 compared to 1990). The scope of this Law includes all GHG emissions, including methane. The Emissions Trading Systems Directive (ETS Directive),[35] the Effort Sharing Regulation (ESR), and the LULUCF regulations implement the European Climate Law in different sectors.

The ETS Directive is the central regulatory instrument of greenhouse gas emissions mitigation, as it covers all greenhouse gases. Specifically, the ETS Directive sets a limit on the total amount of certain GHGs that can be emitted by listed economic activities. The Directive further permits the trading of emissions allowances so that the total emissions from regulated activities stay within the cap, and the least-cost measures can be taken to reduce emissions. However, agricultural activities are excluded from this scope. As a result, animal agriculture is exempted from the ETS Directive.

For its part, the LULUCF Regulation covers methane and nitrogen emissions, but its territorial scope is limited to certain land types in a way that excludes the bulk of animal agriculture activities by excluding lands that emit enteric fermentation and manure management.[36] In practical terms, the regulation only covers the indirect GHG emissions from animal agriculture, not the emissions produced directly by farm animals.

Direct emissions from farm animals are, however, covered under the ESR Regulation, which complements both the ETS Directive and the LULUCF Regulation by addressing all GHG emissions not regulated under these two instruments. Specifically, the ESR sets reduction targets for each of the 27 Member States for all GHG emissions, including methane and nitrogen. However, the ESR also allows Member States to make use of compensation mechanisms across GHG emissions, whereby Member

35 Directive 2003/87/EC of the European Parliament and of the Council of 13 October 2003 establishing a scheme for greenhouse gas emission allowance trading within the Community, 2003 OJ L 275/32-46.

36 Although the LULUCF Regulation proposal by the European Commission included gas emissions from enteric fermentation and manure management in its scope. For more on this topic, see Roberto Talenti, Revising the European Regulatory Framework for Livestock-Related GHG Emissions - Is the EU Really Advancing Towards Climate Neutrality?, Rivista quadrimestrale di diritto dell'ambiente (2022).

States can choose to reduce certain GHGs to compensate for the lack of reduction of other gases.[37]

This compensation mechanism undermines the effectiveness of the Regulation in reducing GHG emissions in animal agriculture, as Member States almost always choose to reduce other emissions than those originating from animal agriculture.[38] Additionally, under the ESR, Member States are allowed to compensate across years. In years where emissions are lower than their annual emission allocations, Member States can bank surpluses and use them in later years (within a certain limit). In years where emissions are higher than the annual limit, Member States can borrow a limited amount of allocations from the following year. The compensation mechanisms under the ESR are thus less strict than the flexibility mechanisms in the LULUCF Regulation.

1.2.2. THE NITRATES DIRECTIVE

Directive 91/676 concerning the protection of waters against pollution caused by nitrates from agricultural sources (Nitrates Directive)[39] sets a limit of 170 kilograms of nitrogen per hectare per year from animal manure, including manure deposited directly by the animals.[40]

However, until 1995, the Directive also provided the possibility for Member States to derogate from this rule and apply up to 210 kilograms of nitrogen per hectare per year.[41] Additionally, the European Commission has granted at least five derogations since the entry into force of the Nitrates Directive, thereby exempting some Member States from the 170-kilogram limit:

- Implementing Decision 2022/696 granting a derogation requested by **Ireland**, valid for three years until 31 December 2025;
- Implementing Decision 2020/1074 granting a derogation requested by **Denmark**, valid for four years until 31 July 2024;
- Implementing Decision 2019/1205 granting a derogation requested by **Belgium for the Flemish Region**, valid for four years until 31 December 2022.
- Implementing Decision 2020/1073 of 17 July 2020 granting a derogation requested by the **Netherlands**, valid for two years until 31 December 2022.

The European Commission announced the evaluation of the Nitrates Directive in its 2024 work program and launched a public consultation to gather stakeholders' views on the Nitrates Directive[42] from December 2023 to March 2024. While this evaluation is still ongoing, most respondents to the public consultation insisted on the necessity of the EU and the Member States to implement and enforce the Nitrates Directive, including by way of ending derogations, strengthening monitoring rules on nitrate pollution, and maintaining limits on nitrogen application from manure. Respondents also highlighted the need for stronger coherence between the Nitrates Directive and other EU policies–such as the Water Framework Directive and the Common Agricultural Policy–as well as more robust monitoring of nitrate pollution.[43] The publication of the Commission's evaluation report is slated for the first half of 2025.

37 Article 5, Regulation 2018/842 on Binding Annual Greenhouse Gas Emission Reductions by Member States From 2021 to 2030 Contributing to Climate Action to Meet Commitments Under the Paris Agreement, 2018 OJ L 156/26–42.

38 Roberto Talenti, Revising the European Regulatory Framework for Livestock-Related GHG Emissions - Is the EU Really Advancing Towards Climate Neutrality?, Rivista quadrimestrale di diritto dell'ambiente (2022).

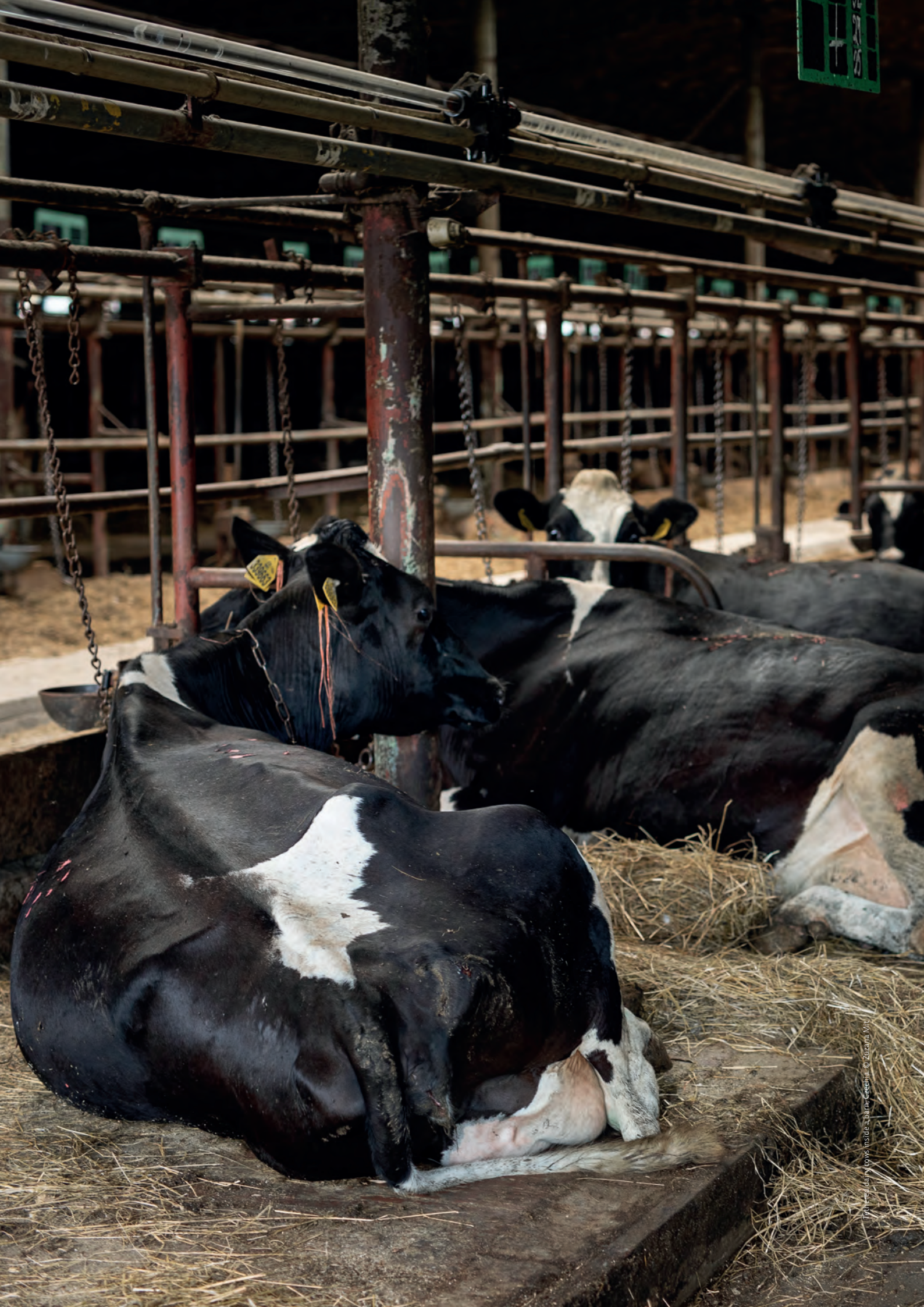
39 Council Directive 91/676/EEC concerning the protection of waters against pollution caused by nitrates from agricultural sources, 1991 OJ L 375/1–8.

40 Annex III, *Ibid*.

41 Annex III, Para. 2(a), *Ibid*.

42 European Commission, «Protecting waters from pollution caused by nitrates from agricultural sources: Evaluation,» available online: https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/14051-Protecting-waters-from-pollution-caused-by-nitrates-from-agricultural-sources-Evaluation_en.

43 Consultation outcome - Summary report, European Commission, «Protecting waters from pollution caused by nitrates from agricultural sources: Evaluation,» available online: https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/14051-Protecting-waters-from-pollution-caused-by-nitrates-from-agricultural-sources-Evaluation/public-consultation_en.



Tethered dairy cows inside a barn, Czechia. © Zuzana Mi

Box 1: The Lack of EU Policy Coherence and Implementation Challenges: The Dutch *Stikstofcrisis* as a Case Study

From 2019 to 2024, the Netherlands faced a political crisis stemming from the Dutch government's attempt to bring the country into compliance with EU environmental legislation. More specifically, the government sought to reduce nitrogen emissions in protected natural areas, which cover 20% of the Dutch national territory.[44] Regulatory actions proposed by the Dutch government aimed at halving nitrogen emissions at national level, in a way that would reduce the number of animals farmed for food. These prospective measures have led to a lasting political crisis in the country.

Like many countries in the EU, Dutch agriculture underwent significant changes due to agricultural reforms in the aftermath of World War II. In the Netherlands, these reforms were primarily led by Sicco Mansholt, the Dutch Minister of Agriculture from 1946 to 1956, before he joined the European Commission as Commissioner for Agriculture in 1958. As part of the Commission, Mansholt laid the foundation for the EU's Common Agricultural Policy, which largely drew from the intensification model he had worked to develop in the Netherlands over the previous decade.

This model led to a significant increase in agricultural production in the Netherlands, to the point where the country has become one of the leading agricultural producers in the EU and the world. The Netherlands is now the world's second-largest exporter of agricultural products by value–behind only the US–with exports worth €128.9 billion in 2024.[45] It is also the largest exporter of meat in the EU, having exported 8.8 billion euros' worth of pork, beef, and poultry in 2020, primarily to Germany (beef and veal), the UK (poultry), and China (primarily pork).[46]

Given its relatively small size and limited landmass, producers in the Netherlands have achieved such massive production volumes through industrial production methods. As a result, the country has the highest density of farm animals in the EU, primarily due to the high number of cows, pigs, and poultry animals.[47] However, these methods have also caused damage to the environment, in particular from nitrogen pollution due to the high concentration of farmed animals. Since the adoption of the Nitrates Directive in 1991, the Netherlands has regularly requested derogations from the Directive, which it continued to obtain until 2022.[48] From 2022 to 2025, EU law required the Netherlands to comply with a gradual reduction plan, with the derogation set to fully expire in 2026. After 2026,[49] Dutch farmers will have to comply with the standard set in the Nitrates Directive, which limits nitrogen from animal manure to 170 kilograms per hectare per year, including manure deposited directly by grazing animals.[50]

Environmental groups, including Coöperatie Mobilisation for the Environment and Vereniging Leefmilieu have filed lawsuits challenging the government's inaction in reducing nitrogen emissions. These suits began in the national courts and have been referred to the Court of Justice of the EU (CJEU).[51] Following a 2017 preliminary ruling by the CJEU, which sided with environmental advocates,[52] the Council of State (the highest Dutch administrative court) ruled that the government's efforts to reduce nitrogen pollution by way of its "nitrogen action plan" had not been effective enough to bring the Netherlands into alignment with conservation measures in Natura 2000 areas and so violated the EU Habitats Directive.[53]

More specifically, the CJEU found that Article 6(3) of the Habitats Directive requires that "the grazing of cattle and the application of fertilisers on the surface of land or below its surface in the vicinity of Natura 2000 sites" were "subject to a permit requirement" and an appropriate environmental impact assessment. The CJEU further found that the Dutch legislature was authorized to adopt measures "including procedures for the surveillance and monitoring of farms whose activities cause nitrogen deposition," as well as "penalties, up to and including the closure of those farms."[54] The Dutch Council of State thus also determined that the Dutch government had acted in violation of EU law.[55]

The Council of State subsequently revoked government permits that had been granted to animal farming operators, on the grounds that these permits were not based on an appropriate environmental assessment. As a result of this ruling, the Dutch authority responsible for issuing environmental permits in Natura 2000 sites was required to consider the risk of habitat deterioration caused by animal agriculture activities, making applications for permits related to animal agriculture ineligible, thus freezing permits for construction of pig, poultry, and dairy operations in Nature 2000 sites. In addition to halting expansion plans for the industrial farm animal production industry, this court ruling also brought uncertainty regarding the viability of existing intensive operations in the Netherlands.

In an attempt to bring the Netherlands into long-term compliance with EU law, the Dutch government published a "Nitrogen Action Program" in 2021, which aimed to halve nitrogen emissions and reduce the number of farm animals by 30%, including through the buyout of farmers operating in or near Natura 2000 sites.[56] The negotiations over the program and its eventual publication provoked violent protests, leading to the creation and rise of the political party "Dutch Farmer-Citizen Movement" (BoerBurgerBeweging – BBB) between 2019 and 2024. The BBB went on to secure 23 seats in the Dutch parliament and two seats in the European Parliament.

The new Dutch government, formed after the 2023 national elections, subsequently decided to abandon the Nitrogen Action Plan,[57] despite a Dutch court ruling issued in January 2025 – following a lawsuit filed by Greenpeace – that ordered the government to adopt effective measures against nitrogen emissions.[58]

44 Protected Areas in the Netherlands, 2022, October 18th, 2024, clo.nl, https://www.clo.nl/en/indicators/en142505-protected-areas-in-the-netherlands-2022

45 Strong Growth In Dutch Agricultural Exports Driven By European Trade, January 17th, 2025, wur.nl, https://www.wur.nl/en/newsarticle/strong-growth-in-dutch-agricultural-exports-driven-by-european-trade.htm

46 Laura Reiley, "Cutting-Edge Tech Made This Tiny Country a Major Exporter of Food," November 21st 2022, The Washington Post, washingtonpost.com, https://www.washingtonpost.com/business/interactive/2022/netherlands-agriculture-technology/ (last visited May 5th, 2025).

47 Eurostat, "Agri-Environmental Indicator: Livestock Patterns," available online: https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Agri-environmental_indicator_-_livestock_patterns

48 Implementing Decision 2020/1073 of 17 July 2020 granting a derogation requested by the Netherlands, valid for two years until 31 December 2022, OJ L 234, 21.7.2020, p. 20–28.

49 Implementing Decision 2022/2069 on granting a derogation requested by the Netherlands pursuant to Directive 91/676/EEC concerning the protection of waters against pollution caused by nitrates from agricultural sources, OJ L 277, 27.10.2022, p. 195–207.

50 Annex III, Council Directive 91/676/EEC concerning the protection of waters against pollution caused by nitrates from agricultural sources, 1991 OJ L 375/1–8.

51 For an overview of these cases, see Raad van State, "Stikstof," https://www.raadvanstate.nl/stikstof/ (in Dutch) (last visited May 8th, 2025).

52 Joined Cases C-293/17 and C-294/17, Coöperatie Mobilisation for the Environment UA, Vereniging Leefmilieu v College van gedeputeerde staten van Limburg, College van gedeputeerde staten van Gelderland (C-293/17), Stichting Werkgroep Behoud de Peel v College van gedeputeerde staten van Noord-Brabant (C-294/17), 7 November 2018, ECLI:EU:C:2018:882.

53 Council Directive 92/43/EEC of 21 May 1992 on the Conservation of Natural Habitats and of Wild Fauna and Flora, 1991 OJ L 206/7–50.

54 Para. 138, Joined Cases C-293/17 and C-294/17, Coöperatie Mobilisation for the Environment UA, Vereniging Leefmilieu v College van gedeputeerde staten van Limburg, College van gedeputeerde staten van Gelderland (C-293/17), Stichting Werkgroep Behoud de Peel v College van gedeputeerde staten van Noord-Brabant (C-294/17), 7 November 2018, ECLI:EU:C:2018:882.

55 Dutch Council of State, May 29, 2019; ECLI:NL:RVS:2019:1603, available at: https://www.raadvanstate.nl/uitspraken/@115602/201600614-3-r2/

56 Omzien naar elkaar, vooruitkijken naar de toekomst Coalitieakkoord 2021 – 2025, December 2021, available online: https://www.tweedekamer.nl/sites/default/files/atoms/files/coalitieakkoord-2021-2025.pdf

57 Saskia O'Donoghue, "New Dutch Coalition Climate Plans: Why the Regions Are Fighting to Keep a Successful Rural Programme," September 6th, 2024, Euronews, euronews-com, https://www.euronews.com/green/2024/09/06/new-dutch-coalition-climate-plans-why-the-regions-are-fighting-to-keep-a-successful-rural- (last visited May 5th, 2025).

58 Rosie Frost, "Dutch Government Ordered to Cut Nitrogen Emissions by 2030: Victory for Greenpeace," January 22nd, 2025, Euronews, euronews.com, https://www.euronews.com/green/2025/01/22/dutch-government-ordered-to-cut-nitrogen-emissions-by-2030-victory-for-greenpeace (last visited May 5th, 2025).

1.2.3. THE INDUSTRIAL EMISSIONS DIRECTIVE

The Industrial Emissions Directive 2010/75/EU (IED)[59] aims to limit pollution, defined as "the direct or indirect introduction, by human activity, of substances, vibrations, heat or noise into the air, water or land which may damage human health or the quality of the environment, result in damage to material property, impair or interfere with amenities or other legitimate uses of the environment,"[60] a definition that therefore includes GHG emissions.

The IED provides a permit system for any industrial installation, requiring them to comply with various requirements set in the Directive.61 The IED further harmonizes the rules on emissions, by requiring the use of Best Available Techniques (BAT) to reduce emissions.[62] Lastly, under the Directive, Member States must set up an environmental inspection system for installations with a significant environmental impact.[63]

However, the effect of the IED has been limited for a number of reasons. First, the requirements under the IED focus on reducing the intensity of emissions rather than capping the total absolute volume of emissions. Such an approach, called a "concentration approach," is detrimental to animals because it favors farming methods that achieve high production volumes and consequently emit relatively low emissions per production unit. From an environmental perspective, this concentration approach can lead to a rebound effect, whereby producers need to maintain high productivity levels to remain environmentally efficient, which in turn drives up overall production and absolute emissions.[64] The 2024 revision of the IED maintained the concentration approach as a core element of its environmental requirements.

Second, the scope of the IED is narrow. Until 2024, when the IED was revised, the scope of the Directive was limited to slaughterhouses and "intensive rearing of poultry or pigs: (a) with more than 40 000 places for poultry; (b) with more than 2 000 places for production pigs (over 30 kg), or (c) with more than 750 places for sows."[65] The revision of the Directive extended its scope to pig farms with more than 350 livestock units (LSU)[66] (except organic pig farms), poultry farms with more than 280 LSU (300 LSU for egg-laying hens farms), and mixed pig and poultry farms with more than 380 LSU.[67] With this new scope, the IED covers 30% of pig and poultry farms in the EU.[68] However, cattle farms remain excluded from the scope of the IED. The Directive only requires the Commission to publish a report to address the emissions from farmed animals by the end of 2026, which "shall be accompanied by a legislative proposal where appropriate."[69]

While the 2024 revision of the IED extended its scope, the revision also provided a specific, more liberal regulatory regime for poultry and pig farms.[70] Compared to the 2010 IED, the 2024 IED thus requires operators to provide less information to apply for permits, establishes weaker obligations compared to permits for other installations, and limits public participation. The new IED further relies on "operating rules […] consistent with the use of BAT"[71] as opposed to BAT and BAT reference

59 Directive 2010/75/EU of the European Parliament and of the Council of 24 November 2010 on industrial emissions (integrated pollution prevention and control), OJ L 334, 17.12.2010, p. 17-119.

60 Article 3(2), *Ibid*.

61 Article 5, *Ibid*.

62 Article 3(10), *ibid*.

63 Article 23, *Ibid*.

64 Marcelo Enrique Conti, Raffaele Ciasullo, Mabel Beatriz Tudino, and Elias Jorge Matta, *The Industrial Emissions Trend and the Problem of the Implementation of the Industrial Emissions Directive (IED),* Air Qual Atmos Health (2015).

65 Annexes I, Para. 6.6., *Ibid*.

66 The revised Directive switched to using LSU as a reference unit. In practical terms, 350 LSU equals 700 breeding sows or 1166 pigs over 20 kg, 280 LSU equals 40,000 broilers, 9,333 turkeys or 28,000 ducks and 300 LSU equals 21,428 laying hens. One LSU is equivalent to 1 dairy cow, 2 breeding sows, 10 goats, 10 sheep, 71 laying hens, or 142 broilers.

67 Annex Ia, Directive 2010/75/EU of the European Parliament and of the Council of 24 November 2010 on industrial and livestock rearing emissions (integrated pollution prevention and control), OJ L 334, 17.12.2010, p. 17–119.

68 European Commission. Industrial and Livestock Rearing Emissions Directive (IED 2.0). Available online at: https://environment.ec.europa.eu/topics/industrial-emissions-and-safety/industrial-and-livestock-rearing-emissions-directive-ied-20_en (last accessed on 1 April 2025).

69 Art. 73(3), Directive 2010/75/EU of the European Parliament and of the Council of 24 November 2010 on industrial and livestock rearing emissions (integrated pollution prevention and control), OJ L 334, 17.12.2010, p. 17–119.

70 Chapter IVa new, as amended by Article 1, (39) and (40), Directive 2024/1785 amending Directive 2010/75/EU on industrial emissions and Directive 1999/31/EC on the landfill of waste, OJ L, 2024/1785, 15.7.2024.

71 Article 1, (12a), Directive 2024/1785 amending Directive 2010/75/EU on industrial emissions and Directive 1999/31/EC on the landfill of waste, OJ L, 2024/1785, 15.7.2024.

documents (BREFs) that were required previously.[72] The Commission will subsequently enact these operating rules, which are expected to enter into force between 2030 and 2032.

Lastly, the 2024 IED includes a derogation that allows Member States to exempt farms from permit obligations, requiring them only to register with the competent authorities instead.[73] As a result, while the 2024 IED extends the scope to cover more farms, Member States now have the discretion to impose more lenient rules. Furthermore, cattle farms are still excluded from the scope of the IED, despite being a major source of methane emissions. The Commission's Methane Strategy[74] highlighted the potential for reductions of these emissions in the agricultural sector as a way to reduce methane emissions overall, especially given that emissions are not decreasing at the rate necessary to meet the EU's climate objectives.[75]

Existing EU environmental statutes are thus falling short of effectively regulating greenhouse gas emissions in animal agriculture, even though the European Commission recently revised the majority of these statutes. To effectively address massive GHG emissions originating from animal agriculture, upcoming reforms will have to effectively challenge the animal agricultural exceptionalism doctrine that underpins EU environmental legislation.[76]

72 Art. 70i(2), Directive 2010/75/EU on industrial and livestock rearing emissions, OJ L 334, 17.12.2010, p. 17–119.

73 Article 4(1), as amended by Article 1(5), Directive 2024/1785 amending Directive 2010/75/EU on industrial emissions and Directive 1999/31/EC on the landfill of waste, OJ L, 2024/1785, 15.7.2024.

74 Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on an EU strategy to reduce methane emissions, COM/2020/663 final.

75 European Environment Agency (2023). Methane emissions in the EU: the key to immediate action on climate change. Available online at: https://www.eea.europa.eu/publications/methane-emissions-in-the-eu (last accessed on 1 April 2025).

76 In that sense, see Roberto Talenti, Revising the European Regulatory Framework for Livestock-Related GHG Emissions - Is the EU Really Advancing Towards Climate Neutrality?, Rivista quadrimestrale di diritto dell'ambiente (2022).

Box 2: The Revision of the Industrial Emissions Directive

The European Commission published a legislative proposal to revise the Industrial Emissions Directive (IED) in April 2022. The proposed revision expanded the scope of the IED to cover cattle, pigs, and poultry farms containing 150 and more livestock units (LSU).[77] Such an expansion in the scope of the IED was motivated by environmental protection objectives, as the Commission evaluated that the revised scope would result in regulating animal farms emitting 60% of ammonia and 43% methane – as opposed to farms emitting 18% of ammonia and 3% of methane under the previous Directive.[78] Moreover, in its proposal, the Commission estimated that the health and environmental benefits from reduced methane and ammonia emissions would reach €5.5 billion per year, with compliance and administrative costs limited to less than €500 million.[79]

However, the Commission's proposal also included laxer rules, specifically for animal farms:

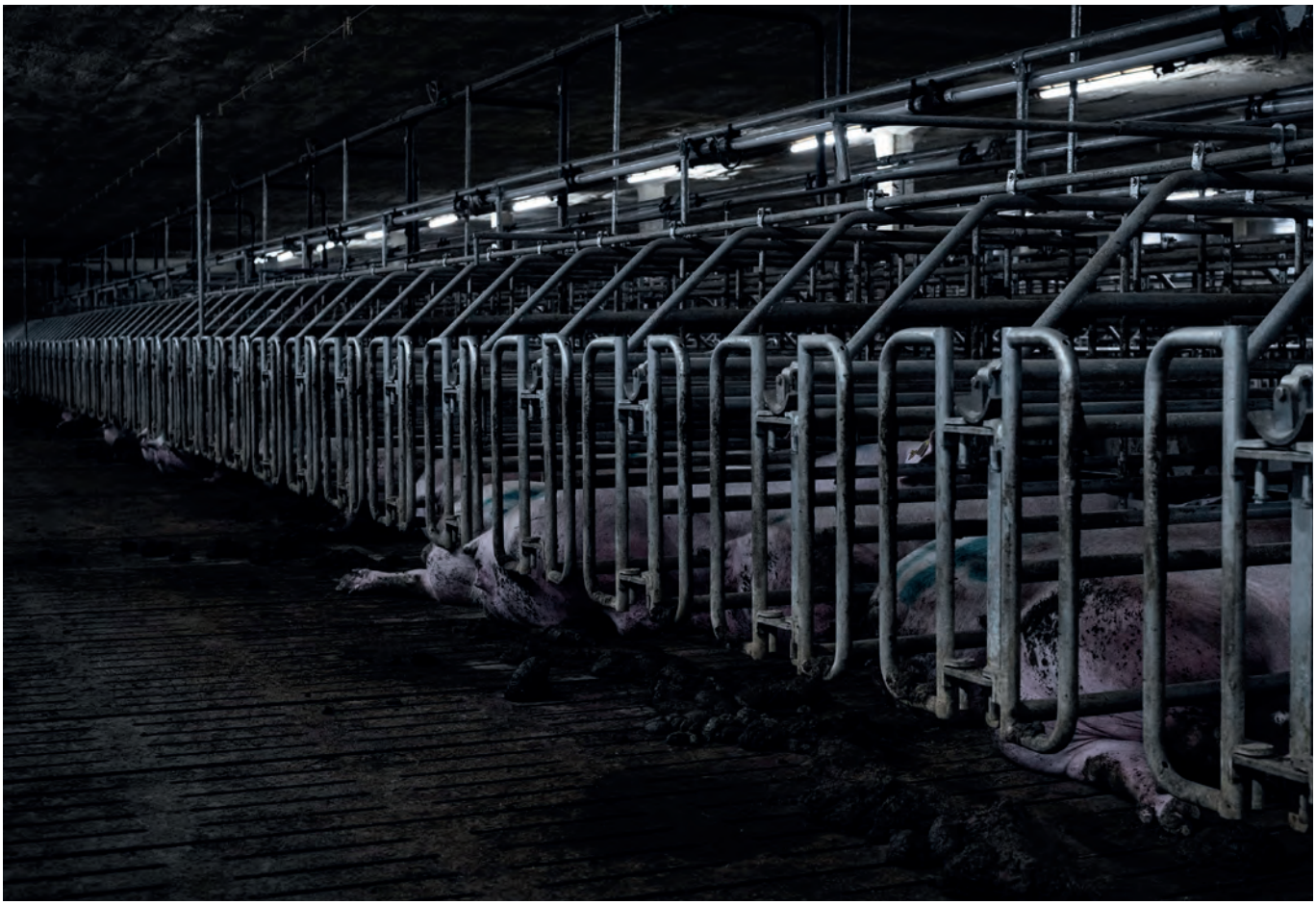
- Permit application and update rules: The Commission proposed that operators need not provide as much information when applying for or updating a permit. For instance, operators would have been required to update their permit "where appropriate" and only in the event of "substantial change." The Commission further proposed allowing Member States to only provide a registration system for farms, instead of a permit system.
- Environmental rules: The Commission proposed that operators comply with "operating rules" rather than Best Available Techniques (BAT).
- Monitoring rules: While Member States were required to conduct environmental inspections, the Commission proposed that Member States be allowed to provide "other measures" at the Member States' discretion.
- Public participation rules: The Commission's proposal limited the scope of instances requiring a public participation to take place, as well as the scope of the information which must be made public.

All these measures were eventually codified in the final version of the IED.

The European Parliament's Committee on Agriculture and Rural Development (AGRI Committee) opposed the proposed extended scope, advocating instead to exclude cattle farms and maintain current regulatory thresholds. Alternatively, it proposed covering poultry and pig farms with a capacity of 750 LSU, applying whichever threshold is lower. The AGRI Committee also proposed applying the new, laxer regulatory regime to all these farms. The majority in the Parliament adopted the AGRI Committee's amendments to the Commission's proposal in July 2023.[80]

The position of the Council of the EU, which was adopted in March 2023, was more ambitious than that of the European Parliament, since the Council proposed to include a larger number of farms, including cattle farms (specifically, a threshold of 350 LSU for cattle and pig farms, 280 LSU for poultry farms, and 350 LSU for mixed farms).[81]

The final text was adopted by the Parliament in April 2024, despite attempts from the leading political groups to block the adoption of the newly expanded scope.



Individual metal cages known as gestation crates (or sow stalls), Germany. © Timo Stammberger

77 One LSU is equivalent to 1 dairy cow, 2 breeding sows, 10 goats, 10 sheep, 71 laying hens, or 142 broilers.

78 Impact Assessment Report accompanying the Proposal for a Directive of the European Parliament and of the Council amending Directive 2010/75/EU of the European Parliament and of the Council of 24 November 2010 on industrial emissions (integrated pollution prevention and control), SWD/2022/111 final.

79 Proposal for a Directive of the European Parliament and of the Council amending Directive 2010/75/EU of the European Parliament and of the Council of 24 November 2010 on industrial emissions (integrated pollution prevention and control), 2022/0104 (COD).

80 Amendment 253, Amendments adopted by the European Parliament on 11 July 2023 on the proposal for a directive of the European Parliament and of the Council amending Directive 2010/75/EU of the European Parliament and of the Council of 24 November 2010 on industrial emissions (integrated pollution prevention and control), COM(2022)0156 – C9-0144/2022 – 2022/0104(COD).

81 Proposal for a Directive of the European Parliament and of the Council amending Directive 2010/75/EU of the European Parliament and of the Council of 24 November 2010 on industrial emissions (integrated pollution prevention and control) – General approach, 7537/23, 2022/0104(COD).

2. A New Regulatory Approach

The current environmental regulatory framework applicable to animal agriculture is marked by incoherence and complexity, requiring more than piecemeal reforms that merely amend existing statures by extending their scope or eliminate exemptions. Beyond the substance of the rules contained in these legal instruments, existing laws have failed to produce any tangible effects also on account of a regulatory approach that now appears antiquated. The EU legislature has, over the past 30 years, relied on a sectoral regulatory approach that consists of regulating certain types of emissions. This emissions-based regulatory approach has so far enabled animal agricultural producers to evade emissions-based rules by systematically carving out exemptions in existing statutes, further deepening the incoherence between policy goals and regulatory objectives.

As the effects of the climate crisis intensify, a more horizontal approach is needed to address the multi-faceted risks posed by the massive production volumes of animal-source foods, not only to the environment, but also to both human and non-human animals. A sector-based, as opposed to emissions-based, regime would be more effective in ensuring that all emissions originating from one industry are regulated effectively. In practical terms, this would mean that a single legislation would be in place to specifically regulate all types of GHG emissions originating from animal agriculture, rather than a vast array of legal instruments, each specifically regulating the one type of emissions across all industrial sectors. Such a sector-based, horizontal regime would also allow more consistency with other non-environmental laws and policies (such as the Common Agricultural Policy).

This change in regulatory approach would require a profound reform of the existing legislative framework, which does not seem attainable in the current post-European Green Deal political context. There exist, however, more reforms that would effectively regulate GHG emissions in animal agriculture without necessarily requiring a shift in the regulatory doctrine of the EU.

2.1. Environmental Law Reforms

A series of targeted legislative reforms could significantly enhance the effectiveness of existing laws, starting with the enactment of a clear regulatory definition for industrial farm animal production. Such a definition would provide the legal basis for excluding factory farms from eligibility for public funding, including agricultural subsidies and support programs under the Common Agricultural Policy (CAP) Regulations.[82] Such a definition, and the adoption of a specific

82 Direct payments (e.g. coupled payment for animal producers in the Member States that provide them), eco-scheme subsidies, and Rural Development Plans programs ("Pillar II" money).

regulatory regime applicable to industrial farm animal production, would also lead to a reduction in GHG emissions by disincentivizing the most polluting forms of activities, especially in the pork, beef, and dairy industries, which receive significant public funding under the CAP.

An additional reform would be to integrate enteric fermentation and manure management into the LULUCF regulation. However, the 2024 Commission's report published on "future projections regarding the emissions of greenhouse gases"[83] required under the LULUCF Regulation did not include any proposals regarding enteric fermentation and manure management.[84] Alternatively, animal agriculture activities could be excluded from the compensation mechanisms in the Effort Sharing Regulation.

The scope of the IED should also be expanded to include all animal agriculture activity, starting with cattle farming, as was initially proposed by the European Commission. Additionally, aquaculture, which is also a significant source of pollutants,[85] should be included, and environmental requirements should aim to reduce GHG emissions in absolute terms, thus moving away from the contraction approach currently in place.

Lastly, a reduction in on-farm stocking densities would reduce greenhouse gas emissions to some extent. For that reason, the EU Legislature, consistent with its 2020 plan to revise EU farm animal welfare legislation, could reduce maximum stocking densities and end cruel common industry practices that enable the extreme confinement of animals.

2.2. Economic Law Reforms

Other reforms would enable the market to play a regulatory role, starting with a reduction in agricultural subsidies and other support programs (such as the EU agri-food promotion programs) that currently benefit industrial farm animal producers, to allow demand for food products to regulate production volumes. The upcoming CAP revision presents an opportunity to implement such changes.

Another impactful measure would be to better regulate commercial speech about animal-source products, including through the specific prohibition of misleading environmental and animal welfare claims. The recent Proposal for a Directive on Substantiation and Communication of Explicit Environmental Claims (Green Claims Directive)[86] has the potential to achieve this objective.

83 Article 17, Regulation 2023/839 amending Regulation 2018/841 as regards the scope, simplifying the reporting and compliance rules, and setting out the targets of the Member States for 2030, OJ L 107, 21.4.2023, p. 1–28.

84 Report from the Commission to the European Parliament and the Council on the Operation of Regulation (EU) 2018/841 ("LULUCF Regulation") pursuant to Article 17(2) as amended by Regulation 2023/839 COM/2024/195 final, available online: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:52024DC0195.

85 Xiaojing Liu, et al, A Systematic Review on Aquaculture Wastewater: Pollutants, Impacts, and Treatment Technology, Environmental Research (2024).

86 Proposal for a Directive on substantiation and communication of explicit environmental claims (Green Claims Directive), COM/2023/166 final.

Thousands of chickens live in crowded conditions and cover the floor inside a massive barn on a factory farm, Sweden. © Jo-Anne McArthur, We Animals

Annex 1

Industrial Emissions Directive: Comparative Overview of Proposed Amendments of Key Provisions

SCOPE

Directive 2010/75 IED	Commission Proposal	Parliament's Proposed Amendments	Council of the EU's Proposed Amendments	Directive 2010/75 IED as Amended in 2024 (Codified Version)
Annex I 6.6 Intensive rearing of poultry or pigs : (a) with more than 40 000 places for poultry; (b) with more than 2 000 places for production pigs (over 30 kg), or (c) with more than 750 places for sows.	**Annex Ia** 1. Rearing of cattle, pigs or poultry in installations of 150 livestock units (LSU) or more. (150 dairy cows, 300 breeding sows, 500 rearing pig, 10 714 laying hens, 21 528 broilers) 2. Rearing of any mix of the following animals: cattle, pigs,poultry, in installations of 150 LSU or more.	**Amendment 235 to 236 - Annex Ia** 1. Rearing of pigs or poultry in installations of 200 livestock units (LSU) or more (400 breeding sows, 666 rearing pig, 14 285 laying hens, 28 571 broilers), excluding rearing carried out in the context of extensive farming as defined in this Directive. Rearing of cattle in farms or installations of 300 livestock units (LSU) or more (300 dairy cows), excluding rearing carried out in the context of extensive farming as defined in this Directive. 2. Rearing of any mix of the following animals: cattle pigs, poultry, in installations of 250 LSU or more, excluding rearing carried out in the context of extensive farming, as defined in this Directive. Where rearing of one of the above categories of animals is below 25 LSU, that category shall not be counted towards the final LSU of any rearing mix .	**Annex Ia** Rearing of cattle or pigs or poultry in installations of 350 livestock units (LSU) or more (700 breeding sows or 1166 rearing pigs, 350 dairy cows, excluding rearing of cattle or pigs in installations operating under extensive production regimes, where the stocking density is less than 2 LSU/hectare used only for grazing or growing fodder or forage used for feeding the animals in the installation. 2. Rearing of poultry in installations of 280 livestock units (LSU) or more (20 000 laying hens or 40 000 broilers) 3. Rearing, other than rearing activities falling under point 2, of any mix of the following animals: cattle, pigs, poultry, in installations of 350 LSU or more, excluding rearing of cattle or pigs in installations operating under extensive production regimes, where the stocking density is less than 2 LSU/hectare used only for grazing or growing fodder or forage used for feeding the animals in the installation.	**Annex Ia** 1. Rearing of pigs representing 350 LSU (700 breeding sows or 1 166 rearing pigs) excluding rearing activities that are carried out under organic production regimes in accordance with Regulation (EU) 2018/848, or where the stocking density is less than 2 LSU/hectare used only for grazing or growing fodder or forage used for feeding the animals and the animals are reared outside for a significant amount of time in a year or seasonally reared outside. 2. Rearing of only laying hens representing 300 LSU (21.428) or broiler representing 280 LSU (40,000 broilers, 9,333 turkeys or 28,000 ducks) 3. Rearing of any mix of pigs or poultry representing 380 LSU or more.

PERMIT APPLICATION REQUIREMENTS

Directive 2010/75 IED	Commission Proposal	Parliament's Proposed Amendments	Council of the EU's Proposed Amendments	Directive 2010/75 IED as Amended in 2024 (Codified Version)
Article 12 1. Member States shall take the necessary measures to ensure that an application for a permit includes a description of the following: (a) the installation and its activities; (b) the raw and auxiliary materials, other substances and the energy used in or generated by the installation; (c) the sources of emissions from the installation; (d) the conditions of the site of the installation; (e) where applicable, a baseline report in accordance with Article 22(2); (f) the nature and quantities of foreseeable emissions from the installation into each medium as well as identification of significant effects of the emissions on the environment; (g) the proposed technology and other techniques for preventing or, where this is not possible, reducing emissions from the installation; (h) measures for the prevention, preparation for re-use, recycling and recovery of waste generated by the installation; (i) further measures planned to comply with the general principles of the basic obligations of the operator as provided for in Article 11; (j) measures planned to monitor emissions into the environment; (k) the main alternatives to the proposed technology, techniques and measures studied by the applicant in outline.	**Article 70c** 2. Applications for permits shall include at least a description of the following elements: (a) the installation and its activities (b) the animal type (c) the capacity of the installation; (d) the sources of emissions from the installation; (e) the nature and quantities of foreseeable emissions from the installation into each medium. 3.Applications shall also include a non-technical summary of the information referred to in paragraph 2. 4.Member States shall take necessary measures to ensure that the operator informs the competent authority, without delay, of any planned substantial change to the installations falling within the scope of this Chapter which may have consequences for the environment. Where appropriate, the competent authority shall reconsider and update the permit.	**Amendment 37 to 47 - Article 70c** 1a. By way of derogation from the first subparagraph of Article 4 and the first paragraph to this Article, Member States may establish a specific simplified procedure for the registration of the agricultural installations covered by this Chapter. Member States may use any similar procedure already in place for registration. They shall avoid administrative burden and additional costs for the farmer. 2. Applications for permits or simplified registration shall include at least a description of the following elements: (a) the farm, its buildings and its activities (b) the animal type (c) the capacity of the building where the rearing takes place; (d) the sources of emissions from the building where the rearing takes place; (e) the nature and quantities of foreseeable emissions from the building where the rearing takes place, into each medium under normal operating conditions. 3. Applications may include a summary of the information referred to in paragraph 2. (a) Member States shall issue the permits or confirm the registration within six months from the date of the farmer's application.	**Article 70c** 2. Registrations or applications for permits shall include at least a description of the following elements: (a) the installation and its activities (b) the animal type (c) the capacity of the installation; (d) the sources of emissions from the installation; (e) the nature and quantities of foreseeable emissions from the installation into each medium. 3. Applications shall also include a non-technical summary of the information referred to in paragraph 2. 4. Member States shall take necessary measures to ensure that the operator informs the competent authority, without delay, of any planned substantial change to the installations falling within the scope of this Chapter which may have consequences for the environment. Where appropriate, the competent authority shall reconsider and update the permit or request the operator to apply for a permit or make a new registration.	**Article 70c** 2. Registrations or applications for permits shall include at least a description of the following elements: (a) the installation and its activities; (b) the animal type; (c) the stocking density in LSU per hectare calculated in accordance with Annex Ia, where necessary; (d) the capacity of the installation; (e) the sources of emissions from the installation; (f) the nature and quantities of foreseeable emissions from the installation into each medium. 3. Applications shall also include a non-technical summary of the information referred to in paragraph 2. 4. Member States shall take the necessary measures to ensure that the operator informs the competent authority, without delay, of any planned substantial change to the installations falling within the scope of this Chapter which could have consequences for the environment. Where appropriate, the competent authority shall reconsider and update the permit or request the operator to apply for a permit or make a new registration

PERMIT APPLICATION REQUIREMENTS (cont.)

Directive 2010/75 IED	Commission Proposal	Parliament's Proposed Amendments	Council of the EU's Proposed Amendments	Directive 2010/75 IED as Amended in 2024 (Codified Version)
An application for a permit shall also include a non-technical summary of the details referred to in the first subparagraph. **Article 20** Changes by operators to installations 1. Member States shall take the necessary measures to ensure that the operator informs the competent authority of any planned change in the nature or functioning, or an extension of the installation which may have consequences for the environment. Where appropriate, the competent authority shall update the permit. 2. Member States shall take the necessary measures to ensure that no substantial change planned by the operator is made without a permit granted in accordance with this Directive. The application for a permit and the decision by the competent authority shall cover those parts of the installation and those details listed in Article 12 which may be affected by the substantial change. 3. Any change in the nature or functioning or an extension of an installation shall be deemed to be substantial if the change or extension in itself reaches the capacity thresholds set out in Annex I.		4. Member States shall take necessary measures to ensure that the farmer informs the competent authority, without delay, of any planned substantial change to the farm or agricultural installation where the rearing activity takes place, falling within the scope of this Chapter which may have consequences for the environment. Where appropriate and within two months from the notification by the farmer, the competent authority shall reconsider and update the permit. (a) One year following the full implementation of the authorisation and registration system in Member States, the Commission shall submit a report to the European Parliament and to the Council assessing the impact of the system on the economic viability of farms falling within the scope of this Directive, taking into account all costs related to complying with the conditions set out in this Directive, in order to adapt certain dispositions emanating from the Directive accordingly.		

MONITORING

Directive 2010/75 IED	Commission Proposal	Parliament's Proposed Amendments	Council of the EU's Proposed Amendments	Directive 2010/75 IED as Amended in 2024 (Codified Version)
Article 14 Permit conditions 1. Member States shall ensure that the permit includes all measures necessary for compliance with the requirements of Articles 11 and 18. Those measures shall include at least the following: (a) emission limit values for polluting substances listed in Annex II, and for other polluting substances, which are likely to be emitted from the installation concerned in significant quantities, having regard to their nature and their potential to transfer pollution from one medium to another; (b) appropriate requirements ensuring protection of the soil and groundwater and measures concerning the monitoring and management of waste generated by the installation; (c) suitable emission monitoring requirements specifying: (i) measurement methodology, frequency and evaluation procedure; and (ii) where Article 15(3)(b) is applied, that results of emission monitoring are available for the same periods of time and reference conditions as for the emission levels associated with the best available techniques; (d) an obligation to supply the competent authority regularly, and at least annually, with:	**Article 70d** Obligations of the operator 1. Member States shall ensure that the operator carries out monitoring of emissions and of associated environmental performance levels in accordance with the operating rules referred to in Article 70i. The operator shall keep a record of, and process, all monitoring results, for a period of at least 6 years, in such a way as to enable the verification of compliance with the emission limit values and environmental performance limit values set out in operating rules referred to in Article 70i. 2. In the event of non-compliance with the emission limit values and environmental performance limit values set out in the operating rules referred to in Article 70i, Member States shall require that the operator takes the measures necessary to ensure that compliance is restored within the shortest possible time. 3. The operator shall ensure that any land spreading of waste, animal by-products or other residues generated by the installation is undertaken in accordance with the best available techniques, as specified in the operating rules referred to in Article 70i, and other relevant Union legislation and that it does not cause significant pollution of the environment.	**Amendment 48 to 51 - Article 70 d** Deleted **Amendment 52 - Article 70 e (3)** 3. Where appropriate, the farmer shall make available the data and information listed in paragraph 2 of this Article to the competent authority upon duly justified request. The competent authority may make such a request in order to verify compliance with the operating rules referred to in Article 70i. Nonetheless, without prejudice to the second subparagraph of Article 4(2) of Directive 2003/4/EC, at the request of the farmer, parts of such reports that involve sensitive commercial or industrial information, or which include personal data within the meaning of Article 4(1) of Regulation (EU) 2016/679 that are not strictly necessary for the purpose of this Article, shall not be published. **Amendment 195 - Article 70e (1)** 1. Member States shall ensure that suitable monitoring under uniform conditions is carried out in accordance with the operating rules laid down in the delegated act referred to in Article 70i.	**Article 70d** Obligations of the operator 1. Member States shall ensure that the operator carries out monitoring of emissions and of associated environmental performance levels in accordance with the operating rules and the uniform conditions for their implementation laid down in the implementing act referred to in Article 70i. Monitoring data shall be obtained by means of measurement methods or, where not practicable, by calculation methods such as the use of emission factors; both methods shall be described in the operating rules. The operator shall keep a record of, and process, all monitoring results, for a period of at least 65 years, in such a way as to enable the verification of compliance with the emission limit values and environmental performance limit values set out in operating rules referred to in Article 70i. 2. In the event of non-compliance with the emission limit values and environmental performance limit values set out in the operating rules and the uniform conditions for their implementation laid down in the implementing act referred to in Article 70i, Member States shall require that the operator takes the measures necessary to ensure that compliance is restored within the shortest possible time.	**Article 70d** Obligations of the operator 1. Member States shall ensure that the operator carries out monitoring of emissions and of associated environmental performance levels in accordance with the uniform conditions for operating rules referred to in Article 70i. Monitoring data shall be obtained by means of measurement methods or, where not practicable, by calculation methods such as the use of emission factors. The methods used for obtaining the monitoring data shall be described in the operating rules. The operator shall keep a record of, and process, all monitoring results, for a period of at least 5 years, in such a way as to enable the verification of compliance with the emission limit values and environmental performance limit values set out in operating rules. 2. In the event of non-compliance with the emission limit values and environmental performance limit values set out in the uniform conditions for operating rules referred to in Article 70i, Member States shall require the operator to take the measures necessary to ensure that compliance is restored within the shortest possible time.

MONITORING (cont.)

Directive 2010/75 IED	Commission Proposal	Parliament's Proposed Amendments	Council of the EU's Proposed Amendments	Directive 2010/75 IED as Amended in 2024 (Codified Version)
(i) information on the basis of results of emission monitoring referred to in point (c) and other required data that enables the competent authority to verify compliance with the permit conditions; and (ii) where Article 15(3)(b) is applied, a summary of the results of emission monitoring which allows a comparison with the emission levels associated with the best available techniques; (e) appropriate requirements for the regular maintenance and surveillance of measures taken to prevent emissions to soil and groundwater pursuant to point (b) and appropriate requirements concerning the periodic monitoring of soil and groundwater in relation to relevant hazardous substances likely to be found on site and having regard to the possibility of soil and groundwater contamination at the site of the installation; (f) measures relating to conditions other than normal operating conditions such as start-up and shut-down operations, leaks, malfunctions, momentary stoppages and definitive cessation of operations; (g) provisions on the minimisation of long-distance or transboundary pollution; (h) conditions for assessing compliance with the emission limit values or a reference to the applicable requirements specified elsewhere.	**Article 70e** Monitoring 1. Member States shall ensure that suitable monitoring is carried out in accordance with the operating rules referred to in Article 70i. 2. All monitoring results shall be recorded, processed and presented in such a way as to enable the competent authority to verify compliance with the operating conditions, emission limit values and environmental performance limit values which are included in the general binding rules referred to in Article 6 or in the permit. 3. The operator shall, without delay, make available the data and information listed in paragraph 2 of this Article to the competent authority upon request. The competent authority may make such a request in order to verify compliance with the operating rules referred to in Article 70i. The competent authority shall make such a request if a member of the public requests access to the data or information listed in paragraph 2 of this Article.	**Amendment 196 - Article 70e (3)** 3. The operator shall, without delay, make available the data and information listed in paragraph 2 of this Article to the competent authority upon request. The competent authority may make such a request in order to verify compliance with the operating rules. The competent authority shall make such a request if a member of the public requests access to the data or information listed in paragraph 2 of this Article.	3. The operator shall ensure that any land spreading of waste, animal by-products or other residues generated by the installation is undertaken in accordance with the best available techniques, as specified in the operating rules referred to in Article 70i, and other relevant Union legislation and that it does not cause significant pollution of the environment. **Article 70e** Monitoring 1. Member States shall ensure that suitable monitoring is carried out in accordance with the operating rules and the uniform conditions for their implementation laid down in the implementing act referred to in Article 70i. 2. All monitoring results shall be recorded, processed and presented in such a way as to enable the competent authority to verify compliance with the operating conditions, emission limit values and environmental performance limit values which are included in the general binding rules referred to in Article 6 or in the permit. 3. The operator shall, without delay, make available the data and information listed in paragraph 2 of this Article to the competent authority upon request. The competent authority may make such a request in order to verify compliance with the operating rules referred to in Article 70i.	3. The operator shall ensure that any manure management, including land spreading of waste, animal by-products or other residues generated by the installation is undertaken in accordance with the best available techniques, as specified in the operating rules, and other relevant Union legislation and that it does not cause significant pollution of the environment. **Article 70e** Monitoring 1. Member States shall ensure that suitable monitoring is carried out in accordance with the uniform conditions for operating rules referred to in Article 70i. 2. All monitoring results shall be recorded, processed and presented in such a way as to enable the competent authority to verify compliance with the operating conditions, emission limit values and environmental performance limit values which are included in the general binding rules referred to in Article 6 or in the permit. 3. The operator shall, without delay, make available the data and information listed in paragraph 2 to the competent authority upon request. The competent authority may make such a request in order to verify compliance with the uniform conditions for operating rules. The competent authority shall make that request if a member of the public requests access to the data or information listed in paragraph 2.

MONITORING (cont.)

Directive 2010/75 IED	Commission Proposal	Parliament's Proposed Amendments	Council of the EU's Proposed Amendments	Directive 2010/75 IED as Amended in 2024 (Codified Version)
Article 16 Monitoring requirements 1. The monitoring requirements referred to in Article 14(1)(c) shall, where applicable, be based on the conclusions on monitoring as described in the BAT conclusions. 2. The frequency of the periodic monitoring referred to in Article 14(1)(e) shall be determined by the competent authority in a permit for each individual installation or in general binding rules. Without prejudice to the first subparagraph, periodic monitoring shall be carried out at least once every 5 years for groundwater and 10 years for soil, unless such monitoring is based on a systematic appraisal of the risk of contamination.			The competent authority shall make such a request if a member of the public requests access to the data or information listed in paragraph 2 of this Article.	

RULES IN CASES OF NON-COMPLIANCE

Directive 2010/75 IED	Commission Proposal	Parliament's Proposed Amendments	Council of the EU's Proposed Amendments	Directive 2010/75 IED as Amended in 2024 (Codified Version)
Article 8 Non-compliance 1. Member States shall take the necessary measures to ensure that the permit conditions are complied with. 2. In the event of a breach of the permit conditions, Member States shall ensure that: (a) the operator immediately informs the competent authority; (b) the operator immediately takes the measures necessary to ensure that compliance is restored within the shortest possible time; (c) the competent authority requires the operator to take any appropriate complementary measures that the competent authority considers necessary to restore compliance. Where the breach of the permit conditions poses an immediate danger to human health or threatens to cause an immediate significant adverse effect upon the environment, and until compliance is restored in accordance with points (b) and (c) of the first subparagraph, the operation of the installation, combustion plant, waste incineration plant, waste co-incineration plant or relevant part thereof shall be suspended. **Article 21** Reconsideration and updating of permit conditions by the competent authority	**Article 70f** Non-compliance 1. Member States shall ensure that the values for emissions and environmental performance levels monitored in accordance with the operating rules referred to in Article 70i do not exceed the emission limit values and environmental performance limit values set out therein. 2. Member States shall set up an effective compliance monitoring system, based on either environmental inspections or other measures, to check compliance with the requirements set out in this Chapter. 3. In the event of non-compliance with the requirements set out in this Chapter, Member States shall ensure that the competent authority requires the operator to take any measures, in addition to the measures taken by the operator under Article 70d, that are necessary to ensure that compliance is restored without delay. Where non-compliance causes a significant degradation of local air, water or soil conditions, or where it poses, or risks to pose, a significant danger to human health, the operation of the installation shall be suspended by the competent authority until compliance is restored.	**Amendment 197 - Article 70f (1)** 1. Member States shall ensure that the values for emissions and environmental performance levels monitored in accordance with the operating rules in uniform conditions laid down in the delegated act referred to in Article 70i do not exceed the emission limit values and environmental performance limit values set out therein. **Amendment 53 - Article 70f (3)** Deleted	**Article 70f** Non-compliance 1. Member States shall ensure that the values for emissions and environmental performance levels monitored in accordance with the operating rules and the uniform conditions for their implementation laid down in the implementing act referred to in Article 70i do not exceed the emission limit values and environmental performance limit values set out therein. 2. Member States shall set up an effective compliance monitoring system, based on either environmental inspections or other measures, to check compliance with the requirements set out in this Chapter. 3. In the event of non-compliance with the requirements set out in this Chapter, Member States shall ensure that the competent authority requires the operator to take any measures, in addition to the measures taken by the operator under Article 70d, that are necessary to ensure that compliance is restored without delay. Where non-compliance causes a significant degradation of local air, water or soil conditions, or where it poses, or risks to pose, a significant danger to human health, the operation of the installation shall be suspended by the competent authority until compliance is restored	**Article 70f** Non-compliance 1. Member States shall ensure that the values for emissions and environmental performance levels are monitored in accordance with the uniform conditions for operating rules referred to in Article 70i and do not exceed the emission limit values and environmental performance limit values set out therein. 2. Member States shall set up an effective compliance monitoring system, based on either environmental inspections or other measures, to check compliance with the requirements set out in this Chapter. 3. In the event of non-compliance with the requirements set out in this Chapter, Member States shall ensure that the competent authority requires the operator to take any measures, in addition to the measures taken by the operator under Article 70d, that are necessary to ensure that compliance is restored without delay. Where non-compliance causes a significant degradation of local air, water or soil conditions, or where it poses, or risks posing, a significant danger to human health, the operation of the installation shall be suspended by the competent authority until compliance is restored.

NON-COMPLIANCE (cont.)

Directive 2010/75 IED	Commission Proposal	Parliament's Proposed Amendments	Council of the EU's Proposed Amendments	Directive 2010/75 IED as Amended in 2024 (Codified Version)
1. Member States shall take the necessary measures to ensure that the competent authority periodically reconsiders in accordance with paragraphs 2 to 5 all permit conditions and, where necessary to ensure compliance with this Directive, updates those conditions.				

SOURCES

Directive 2010/75 IED	Commission Proposal	Parliament's Proposed Amendments	Council of the EU's Proposed Amendments	Directive 2010/75 IED as Amended in 2024 (Codified Version)
	Proposal for a DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL amending Directive 2010/75/EU of the European Parliament and of the Council of 24 November 2010 on industrial emissions (integrated pollution prevention and control) and Council Directive 1999/31/EC of 26 April 1999 on the landfill of waste ANNEXES to the Proposal for a DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL amending Directive 2010/75/EU of the European Parliament and of the Council of 24 November 2010 on industrial emissions (integrated pollution prevention and control) and Council Directive 1999/31/EC of 26 April 1999 on the landfill of waste https://data.consilium.europa.eu/doc/document/ST-8064-2022-ADD-1-REV-1/en/pdf	Amendments adopted by the European Parliament on 11 July 2023 on the proposal for a directive of the European Parliament and of the Council amending Directive 2010/75/EU of the European Parliament and of the Council of 24 November 2010 on industrial emissions (integrated pollution prevention and control), COM(2022)0156 – C9-0144/2022 – 2022/0104(COD https://www.europarl.europa.eu/doceo/document/A-9-2023-0216_EN.html	Council, General approach on the proposal for a directive amending Directive 2010/75/EU on industrial emissions, ST 7537/23	

Annex 2

"FACTORY FARMING: UNVEILING THE HIDDEN COSTS"
24th-27th MARCH 2025

This document is illustrated with a selection of the photographs and infographics that featured in our March 2025 exhibition in the European Parliament, "Factory Farming: Unveiling the Hidden Costs."

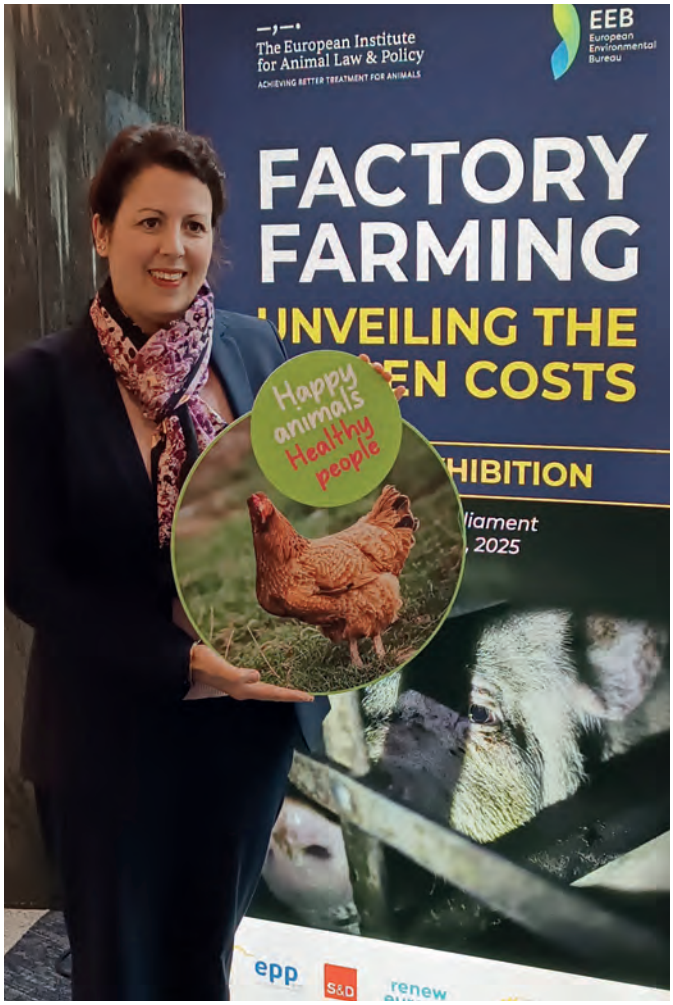
The display of more than 50 striking, unfiltered images, organized in collaboration with the European Environmental Bureau (EEB), laid bare the cruelty, confinement, and suffering inflicted on billions of animals—while also revealing how factory farming devastates ecosystems, endangers public health, and fuels the climate crisis.

Award-winning photojournalist Jo-Anne McArthur, who has dedicated her career to documenting the suffering of animals worldwide through the We Animals project, was the special guest speaker at the launch event. Her frontline stories moved many to tears and deepened admiration for her bravery and that of the 12 other dedicated colleagues at We Animals whose photos featured in the exhibition. "What the images show sharply contradicts what farming industries would have us believe: that the welfare of animals is just fine," she told attendees.

Backing our urgent call for change, Members of the European Parliament (MEPs) from across the political spectrum stood with us. Tilly Metz (Greens/EFA), Manuela Ripa (EPP), Krzysztof Śmiszek (S&D), Michal Wiezik (Renew), and Anja Hazekamp (GUE/NGL) co-hosted the event, while Marc Angel (S&D), Niels Fuglsang (S&D) and Sebastian Everding (GUE/NGL) joined and addressed the gathering. Together, they reinforced the need for the European Commissio to deliver a strategy that supports farmers in transitioning to a system that benefits them, the animals involved, neighboring communities, and nature by:

- **Revising EU Animal Welfare Legislation:** Improve farming conditions by reducing density, banning cages, and ending cruel practices like routine mutilation and force-feeding.
- **Developing an EU Action Plan for Plant-Based Food by 2026:** Transitioning to more plant-based food and farming systems would have a profound and positive impact on animal welfare, climate change, public health, and more.
- **Developing a Livestock Strategy:** Create a comprehensive strategy for the animal farming sector that supports positive farming practices and applies a territorial approach.
- **Rethinking the CAP Post-2027:** Redirect subsidies from intensive animal rearing to support farmers delivering benefits for nature, animal welfare, and the climate.

View the complete set of photos and infographics on the EEB website at https://meta.eeb.org/stories/online-exhibition-factory-farming-unveiling-the-hidden-costs/, and find more pictures from the launch event at https://animallaweurope.org/publications/event-photos/.



Top left: Jo-Anne McArthur, We Animals. Top right: MEP Manuela Ripa (EPP). © EIALP

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Alice Di Concetto founded the European Institute for Animal Law & Policy, where she serves as the Executive Director and Chief Legal Advisor. She additionally is a lecturer in EU animal law and ethics at Sciences Po (Paris, France).

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A lawyer by training, Gabriela joined a major animal protection organization in Brussels in 2021, advising on EU farm animal protection policy matters. Prior to this appointment, Gabriela gained professional experience in the European Parliament, interning in the AGRI Secretariat, as well as at the European Commission.

Gabriela holds a PhD in law from Charles University in Prague, where she specialized in EU farm animal law. Her dissertation, Dobré životní podmínky hospodářských zvířat v právu Evropské unie (Welfare of Farmed Animals in European Union Law), was published in 2024 by Wolters Kluwer and received the Zdeněk Madar Prize awarded by the Czech Society for Environmental Law.

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Anatole Poinsot is a lawyer specializing in EU agricultural, health, and animal law. At the Institute, Anatole has developed an expertise in the transposition of EU legislation into national law. Prior to joining the Institute, Anatole completed an internship at the French National Research Institute for Agriculture, Food and Environment (INRAE), where he studied the challenges of agro-ecological transition.

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