

Agriculture and deforestation

The EU Common Agricultural
Policy, soy, and forest destruction

Proposals for Reform



SUMMARY

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1. Introduction

The EU has made multiple time-bound commitments to ending the region's role in global deforestation. The pledge first appeared in a policy document on climate change in 2008 (which set a target of halving deforestation by 2020 and eliminating it by 2030); it was subsequently reinforced by the EU's decision to sign up for the New York Declaration on Forests at the UN climate summit in 2014, and its endorsement of UN Sustainable Development Goal number 15.^{1 2 3}

The biggest cause of forest loss – accounting for around 70 per cent – is agricultural deforestation, notably for beef, soy, palm oil and commercial timber.⁴ Other crops including cocoa and rubber are also significant causes of forest destruction.

Soy ranks as the second largest agricultural driver of deforestation after cattle products. According to a study for the European Commission, soy expansion was responsible for 19 per cent of global forest loss linked to the growing of crops between 1990 and 2008, along with nearly half (47 per cent) of the deforestation embodied in products imported into the European Union.⁵

This report looks at the linkages between the EU Common Agricultural Policy (CAP) and the expansion of soybean cultivation, which has been the largest source of agricultural deforestation over which the EU has a direct influence.

The EU is involved mainly because European farmers rely on imported soy from Brazil, Argentina and Paraguay to use as animal feed, mostly for pigs and chicken but also for cattle, other farm animals and farmed fish. Of all the soy meal consumed in the EU, 83 per cent goes in concentrate feed for pigs and poultry.⁶

As the EU embarks on another round of CAP reform – intended to shape the policy framework after 2020 – this report assesses the extent to which the CAP is driving deforestation. It also looks at how changes to the CAP and some other policies might actively reduce the deforestation footprint of EU agriculture.

2. The CAP and the GATT

The CAP and its impact on soy imports

The Common Agricultural Policy, founded in 1962, remains a central feature of the EU. It costs more than 50 billion euros a year to run, consumes 40 per cent of the EU budget, and has shaped European farming for more than half a century. At the same time, due to the EU's significance as an importer and exporter of farm products, the CAP has had – more by accident than design – a profound impact on agriculture in many other parts of the world, including places where agricultural expansion has been and continues to be a big driver of deforestation.

The current version of the CAP was put in place in 2013, with three ultimate objectives: enhanced competitiveness, improved sustainability and greater effectiveness. The CAP consists of two principal elements, referred to as 'pillars' in EU terminology.⁷

Pillar one covers various direct payments to farmers and forms of financial assistance classified as market support measures. The main direct payment is a basic income support, calculated according to the number of hectares farmed. In addition, farmers may qualify for direct payments linked to the type of farm and for achieving specified goals. For example, young farmers and farmers in mountain regions get extra help, and there are 'green' payments for agricultural practices seen as beneficial to the climate or environment (adopting these practices has been a mandatory condition of assistance under the CAP since 2013). Market support measures covered under Pillar one include, for example, payments to farmers hit by a sudden drop in crop prices and financial help to build storage facilities, enabling farmers to wait for the best prices before selling their products. Pillar two focuses more generally on supporting rural development. The two-pillar approach was not new in 2013. It dates back to the Agenda 2000 reforms adopted at the turn of the century.

The current version of the CAP represents the latest step in a reform process that has over time radically changed the way financial help to EU agriculture is given. The original policy created a system based on payments for producing particular agricultural products, backed up by guaranteed prices for those products. More recent iterations of the CAP have steadily reduced the link between production and payments to farmers – a process known as decoupling.

At the moment, the CAP has a budget of around EUR 55 billion a year (at 2011 values), of which about 70 per cent goes on decoupled (i.e. not linked to specific products) direct payments to farmers.⁸ These direct payments include around EUR 12 billion a year reserved for 'greening' practices (activities seen as having climate or environmental benefits).⁹ Greening measures come under three headings: crop diversification, maintaining permanent grassland helping to provide forage for ruminants (animals that can eat grass) and cultivating ecological focus areas, which are intended to help maintain or increase biodiversity.

It is largely unknown whether the CAP 2013 reforms will achieve their environment and climate aims. The evidence so far is not encouraging. For example, research suggests that crop diversification measures will only affect 2 per cent of the EU's arable area (because most EU farmers already cultivate



three or more crops), while modelling studies indicate that the introduction of ecological focus areas may only increase species diversity on farmland by an additional 1 per cent.¹⁰

Debate has already begun on the next round of reform, which will determine what the CAP will look like after 2020. Some are calling for very radical changes, ranging from scrapping the CAP altogether to broadening its focus to cover the whole area of rural development (as opposed to just agriculture), or the entire food system, in which case it would become more of a Common (Sustainable) Food Policy. Others want the CAP to evolve further along the two pillar approach with decoupled direct payments remaining in place, further cuts in coupled payments linked to production, and greater emphasis on the greening component in financial assistance given to farmers. A mid-term review is due by the end of 2018.

The future shape of the CAP is relevant to soy imports from outside the EU because it has a major influence on the behaviour of farmers within the EU and on the markets they supply within the EU, which in turn affects what food and feed products the EU imports from abroad. Briefly (more details are set out in the full report), it can be said that past iterations of the CAP have tended to encourage EU farmers to produce meat and to a lesser extent to produce grain. In contrast, the CAP has provided relatively few incentives for local production of protein crops, such as soy, with the result that these products are more likely to be imported from elsewhere. In the case of soy, this means South America, where much of the crop is grown in places challenged by deforestation.

The GATT and its impact on soy imports

Parallel to the establishment of the CAP in the early 1960s, negotiations under the Dillon Round of the General Agreement on Tariffs and Trade (GATT) in 1962 led to substantial cuts in the level of import tariffs set by the EU on protein-rich non-grain feed for the livestock sector (including

soybeans and other oilseeds and products). These products were allowed to enter EU Member States almost duty-free on the grounds that they were essential for the EU livestock sector and did not compete with EU production. The changes in the tariff regime created incentives for farmers to import soy meal and other non-grain concentrate feed products from countries outside the EU, while their own (at that time) subsidised grain production was sold for export.^{11 12}

Key points – the GATT and EU soy imports

- In the 1960s, the Dillon Round of the General Agreement on Tariffs and Trade (GATT) led to almost duty-free imports into EU Member States of protein-rich non-grain feed for the livestock sector.^{13 14}
- Farmers imported non-grain concentrate feed products and flooded the international markets with subsidised grain production thereby depressing prices abroad.^{15 16}
- In the 1980s, the CAP price support scheme of guaranteed minimum prices kept grain prices two to three times higher for EU farmers than world market prices.¹⁷
- In 2011, the EU abolished the protein premium, a direct payment of about EUR 56 per hectare for crops such as peas, field beans and sweet lupins.¹⁸ However from 2014 Member States have been allowed to issue 'Voluntary Coupled Payments' to specific sectors, which amounted to 443 million euros for protein crops in 2015.¹⁹

However, the impact of the CAP and international trade rules are not the only reasons that EU farmers tend to rely on imported soy to feed their livestock. The EU ban since 2001 on using meat and bone meal in animal feed is also a factor. This came as a result of the BSE (bovine spongiform encephalopathy, also known as mad cow disease) crisis in which these feeds were identified as a source of infection. The ban led to the use of an additional 1.5 million tons of soybean meal to substitute for meat and bone meal.²⁰

3. EU consumption of soy

EU farming is strong on meat and dairy production. In 2013, animal products accounted for more than 40 per cent of the value of all farm products in the EU.²¹ One of the major inputs is concentrate feed, i.e. protein- and energy-rich products such as soy or cereals. Pigs and poultry are wholly reliant on this type of food. However, even ruminants reared in the EU (e.g. beef cattle and dairy cows), which could thrive on just grass and forage, have an element of feed concentrates in their diets, in order to obtain high yields and rapid weight gain so as to meet the existing demand for animal products. Current high yields in ruminant milk and meat production are possible only when there is a significant proportion of these concentrates in feeding rations.

Key points – EU soy consumption

- Soy is a major input for concentrates used in animal feed.
- 70 per cent of the protein feed used in the EU is imported.²² 97 per cent of the soy used in feeds in the EU is imported.²³
- 83 per cent of soy meal in the EU is for concentrate feed for pigs and poultry.²⁴
- Soy meal makes up more than 35 per cent of the content of concentrates fed to broiler chickens.²⁵

Animal protein makes up about 60 per cent of human diets in the EU. Consumption of animal products in the EU is currently quite high on average, but differs widely between countries, with annual per capita meat consumption ranging from 13 to 26 kg for beef, for example, or from 28 to 60 kg for pork and 15 to 28 kg for poultry.^{26,27} Countries with an unusually high concentration of meat in the diet include Austria, Luxembourg and Spain, while the data suggest that consumers in Bulgaria, Slovakia and Romania eat less meat than the EU average (see Figure 1).

There has been a significant change in European eating habits in recent years. Consumption of pork and poultry (mostly chicken) has grown much faster than demand for meat and dairy products produced from ruminant animals (e.g. beef). This has led to increased demand for high energy concentrate feed relative to grassland-based fodder.²⁸ Soybean meal is a commonly used concentrate feed, because it is relatively easy to crop under a wide range of climatic and environmental conditions. It also contains more protein than other feed crops. Most of the soybean meal used within the EU goes to the pig and poultry sectors. While some soy is grown locally, the vast bulk of EU consumption is supplied by imports.²⁹

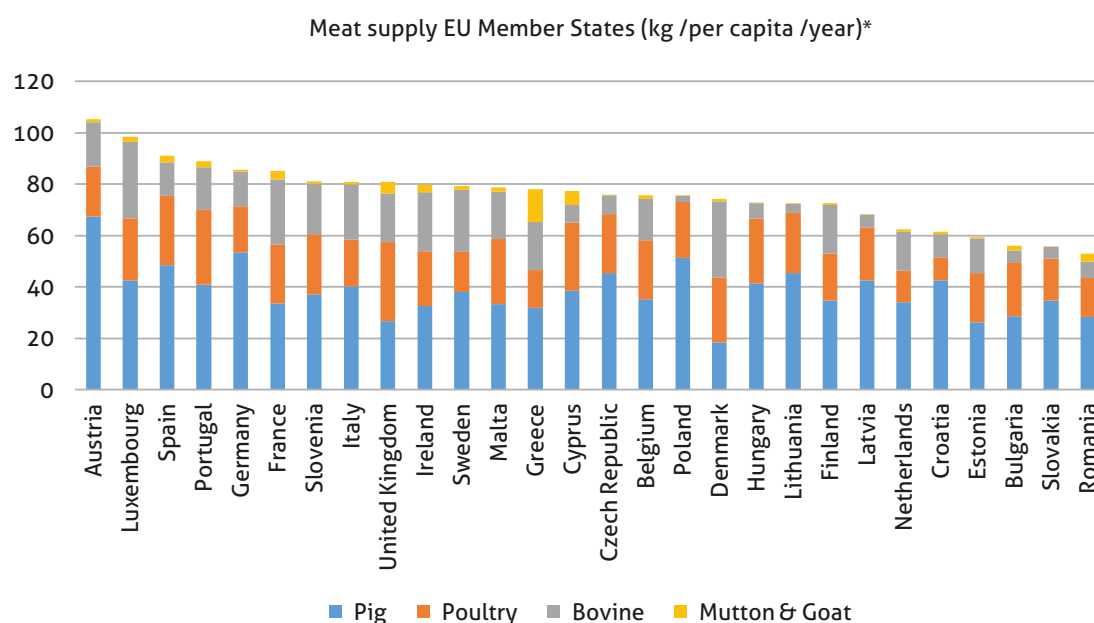
Table 1: Soybean meal needed for the EU-27 consumption of different types of livestock products, 2007

Livestock product	Total consumption 1,000 tonnes	Soy meal per unit	Soy meal needed	
			1,000 tonnes	kg/person
Beef and veal	8,704	232 grams/kg	2,020	4.1
Milk	39,015	21 grams/litre	806	1.6
Pork	20,693	648 grams/kg	13,416	27.1
Poultry meat	10,641	967 grams/kg	10,294	20.8
Eggs	131,697	32 grams/egg	4,212	8.5
Cheese	8,070	186 grams/kg	1,500	3.0
Other products & exports**			3,586	7.2
Total			35,834	72.4

*Milk in million litres and eggs in million eggs. ** Other products: livestock products from all other animals (sheep, goats, ducks, etc.). Exports: all types of livestock products exported outside the EU-27.

Source: Van Gelder et al. (2008, page 8)

Producing concentrate feed, depending on how its constituent crops are grown, can have serious negative impacts on the environment. One such impact, given the EU's dependence on imports, is deforestation abroad. The effects can be especially serious in tropical regions with consequences for biodiversity, greenhouse gas emissions, soil erosion and local communities. The impacts resulting from high volume of imports into the EU of animal feed in the form of soybeans cropped on recently deforested areas in Brazil, Argentina and Paraguay are a prime example.^{30 31}

Figure 1: Animal products – per capita supply for all EU Member States, 2011

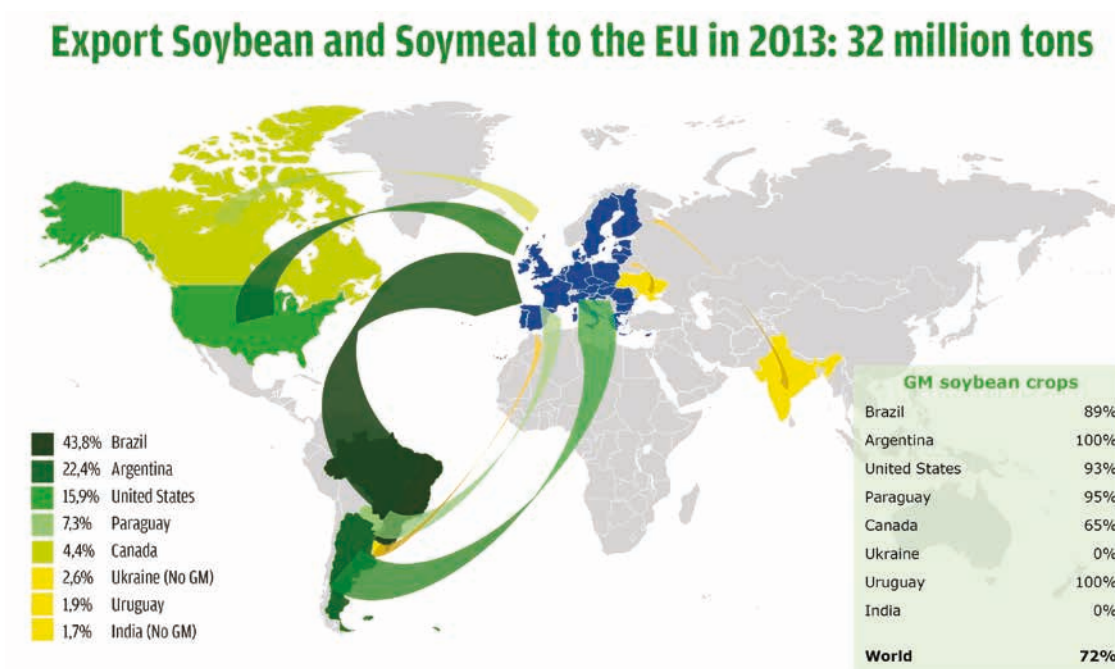
Source: FAOSTAT (2016b)

* Meat supply is the domestically available quantity of meat, which is production plus imports minus exports plus stock changes. This figure is readily available from FAOSTAT. The difference to consumption is food waste and other losses along the value chain.

EU soy imports from forest risk countries Brazil, Argentina and Paraguay

While the EU produces most (90 per cent) of the animal products it consumes, its self-sufficiency in animal feed is very low. 70 per cent of the protein feed for animals reared in the EU is imported.³² As described earlier, the CAP and GATT rules on international trade have led to disincentives for European farmers to fill this production gap with protein crops grown locally. As for soybeans, only about three per cent of soybeans used as feed concentrate is produced within the EU. About half of all EU imports of protein crops for feedstuffs come from Brazil and Argentina.³³

Figure 2: Soybean and soybean product exports to the EU



(This is a modified version of a table that appeared in: EUROPEAN COMMISSION 2015. GMOs: Commission's proposal on Food/Feed. ec.europa.eu/food/plant/docs/20150422_plant_gmo_new_authorisation_gmo_food_feed_proposal_en.pdf)

Soy is the biggest source of protein feed imported to support meat and dairy production in the EU. It enters the EU in various forms, including soybeans and soymeal, both of which may be further processed in the EU.

The three major source countries for soybeans and soymeal coming into the EU are Brazil, Argentina and the USA, followed by Paraguay (see Figure 2). Imports of soybeans and soymeal from South America account for nearly three quarters of total EU soy imports.³⁴ In passing, it is worth noting that the EU is the only major market that demands non-genetically modified soy. Genetically modified varieties account for nearly three quarters of global soybean output.

Analysis of FAOSTAT data suggests that for the EU to become self-sufficient in soy an additional 12–13 million hectares of farm land in the EU would need to be used for soy cultivation – more than 10 per cent of the total EU arable land area. Instead EU demand is mostly met by soy grown on land in South America. According to our analysis, it requires 5.2 million hectares of land in Brazil, 2.7 million hectares in Argentina and 0.9 million hectares in Paraguay to cultivate the soy these countries export to the EU. In total this is an area about the size of Austria.

The amount of potential leverage the EU has over deforestation caused by soy expansion in South America is linked to its importance as a market relative to other markets for the region's soy. By this

measure, the EU emerges as a significant but not dominant player. Analysis of 2016 FAOSTAT data suggests that soy exports to the EU accounted for around 17 per cent of total soy production in Brazil, 14 per cent of production in Argentina and 26 per cent of production in Paraguay.

While soy imports for animal feed are the most important element in the potential deforestation impact of EU livestock production and consumption, they are not the only factor. The EU is not wholly self-sufficient in meat and dairy products. In 2011–13 imports were equivalent to about 15 per cent of domestic production for beef and veal, 22 per cent for poultry and 12–17 per cent for pig meat. For eggs and fresh milk the figures were 1 per cent and 5 per cent respectively.³⁵ Beef imports in particular may make a significant contribution to the EU's deforestation footprint.

Key points – EU soy imports from South America

- 73 per cent of EU soy imports come from Brazil, Argentina and Paraguay.³⁶
 - 44 per cent of the total is from Brazil, accounting for 4.8 million hectares.³⁷
 - The share of soy quantity exported to the EU is highest in Paraguay (26 per cent).³⁸
 - Major importers and traders in the EU are the Netherlands, Germany, France, Spain and Italy.³⁹
- The Netherlands has a strong trade function for soybeans and soybean meal in the EU, exporting mainly to Germany, Belgium and the UK (while Germany exports mainly to the Czech Republic, Poland and Denmark). Belgium also re-exports around 50 per cent of soybeans and soymeal.

Table 2: Soybean export quantities and shares in EU imports, 2013

Exporter	Total soya production (Mt)	Quantity exported to the EU (Mt)	Quantity exported to the EU (% production)	% of EU soy imports	Area needed to produce the soy that is exported to the EU (million ha)	Yield (t/ha) (average 2010-2014, FAOSTAT)
Brazil	81.7	14	17%	44%	4.8 mln ha	2.9
Argentina	49.3	7	14%	22%	2.7 mln ha	2.6
US	91.4	5.1	6%	16%	1.7 mln ha	2.9
Paraguay	9.1	2.4	26%	7%	0.9 mln ha	2.6
Canada	5.4	1.3	24%	4%	0.5 mln ha	2.9
Ukraine	2.8	1	36%	3%	0.5 mln ha	1.9

Yields: derived by summing production over 5 years and then dividing by the sum of the areas over the same 5 years.

Source: Cuyppers et al. (2013), FAOSTAT (2016)

Deforestation in countries that export soy to the EU

Deforestation due to agriculture has many causes. The most direct driver is the profit per hectare that can be obtained by converting forest land for other uses. The greater the profit that can be made from clearing forest, the greater are the incentives to do so, which explains why higher crop yield increases can lead to increased deforestation even though existing agricultural land is used more



efficiently.³⁹ If higher yields drive up the profitability of crop growing, in areas where land can easily be cleared, this can lead to increased deforestation, as concentrate feed production becomes more competitive in these areas, by comparison with other areas where deforestation may not be an issue. Thus the production and demand for animal products in the EU, as well as global trade developments, can result in a situation where forest clearing for soybean production for exports to the EU becomes a profitable activity, leading to increased deforestation.

A second key driver of deforestation is infrastructure development, predominantly road-building.⁴¹ Where forest areas become more easily accessible, the costs of forest clearance, cropping the land and marketing the products all decrease, thus increasing incentives for deforestation (again because of increased profits per hectare).

Other causes of deforestation include the indirect effects of land use change not immediately associated with forest loss.⁴² Converting pasture to soy cultivation in parts of Brazil means less room for cattle which can lead to deforestation to create new pasture for cattle somewhere else; in other words displaced deforestation.

Policy-related and institutional factors also play a major role in deforestation. For example, badly designed regulation can create perverse incentives to cut down forests (e.g. support payments that actively promote the growing of crops associated with forest loss). Similarly, lack of secure tenure rights for communities, inadequate regulation to protect forests and/or poor implementation of what may look like good regulation on paper can also lead to deforestation.^{43 44 45}



Credit: © Greenpeace / Daniel Beltrá

A study published in 2016 estimated that more than a third of the soy imported into the EU from Brazil came from areas of high deforestation risk.⁴⁶

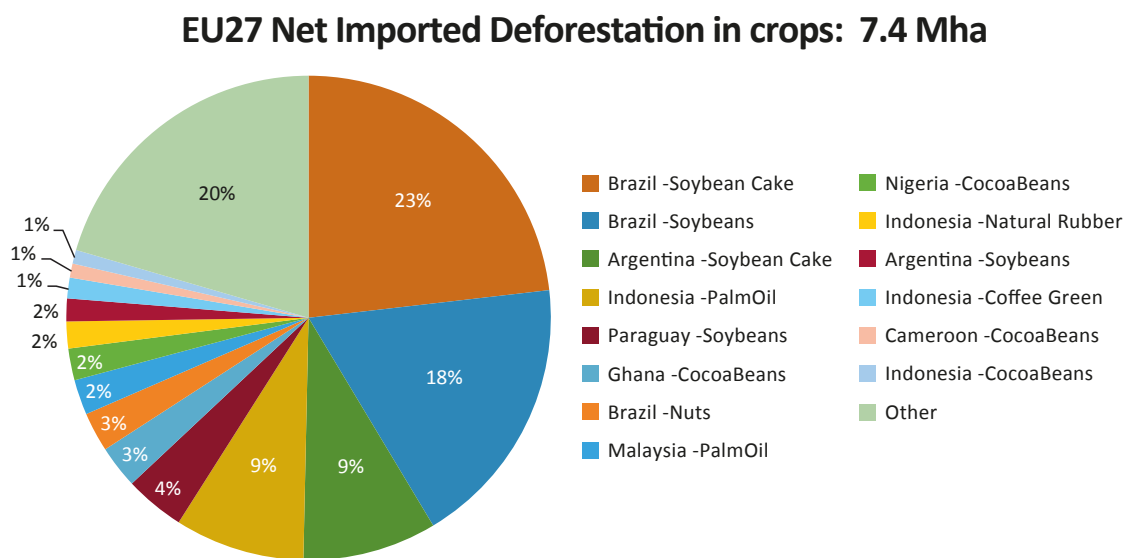
Discussion of the CAP and soy in South America should be seen in the wider context of the overall deforestation footprint of EU consumption of agricultural products imported from parts of the world where forest destruction is a concern. According to a 2013 study for the European Commission, EU crop imports were responsible for around 7.4 million hectares of deforestation between 1990 and 2008, while the deforestation embodied in crop and livestock imports combined amounted to 8.7 million hectares in this period. The largest share of the deforestation attributed to crop imports in the EU is derived from oil crops, mainly soy. Thus, based on the correlation between deforestation and cropping areas described above, soybean cakes and soybeans were responsible for 60 per cent of deforestation linked to EU crop imports. The study estimated that EU consumption of agricultural products accounted for about 7 per cent of total global deforestation from all causes over the period 1990–2008.⁴⁷

Key points – deforestation in countries that export soy to the EU

- In Brazil, the overall rate of deforestation was about 80 per cent lower in 2013 than its 2004 peak.⁴⁸
- But deforestation in the Amazon has begun to climb rapidly again, with the rate of deforestation 29 per cent higher in 2016 than 2015, and 24 per cent higher in 2015 than 2014.⁴⁹
- Leakage effects from the Soy Moratorium, which only applies to the Amazon, may be displacing soy production to other regions without an overall reduction in land clearing.^{50 51}
- In Argentina and Paraguay, deforestation rose from 0.2m ha/year before 2000 to about 0.4m ha/year since the mid-2000s.⁵²

The same 2013 study analysed how the embodied deforestation of the EU27 may develop in the future. Based on the assumption that the EU population will slightly increase and that consumption patterns do not change, by 2030 an additional 3–4 million hectares of agricultural land will be needed to meet EU demand. Of course there is no guarantee that meat-eating habits will remain the same as now. The study found that if consumers across the EU were to move to an Austrian diet – highly meat concentrated – an additional 16 million hectares of agricultural land would be needed to meet demand, i.e. almost 10 per cent of the current agricultural area in the EU of about 175 million hectares. On the other hand, if the EU as a whole adopted Bulgarian tastes – a country with currently low per capita meat consumption – the amount of land required to meet demand would actually fall by 40 million hectares (i.e. almost minus 25 per cent), and a fully vegetarian diet would lead to a reduction by 55 million hectares, i.e. by about a third.⁵³

Figure 3: Crops and countries of origin for deforestation embodied in EU27 crop imports



Source: Cuypers et al. (2013, page 60)

4. Recommendations

What could beneficially be modified under current CAP rules?

While previous rounds of CAP reform have greatly reduced payments to EU farmers linked to production of particular products, some such payments remain. The continuation of the beef premium and a number of animal product related market support measures, clearly make the activities they finance more attractive than they would be without such payments. Remaining 'coupled' payments for animal products, which are purely linked to production should, therefore, be abandoned (e.g. the calf slaughter premium), while these and other payments should be more closely tied to achieving broader environmental goals, making feeding practices more sustainable or improving animal welfare. Abolishing direct payments made per head of animal would be a disincentive to animal production, leading to a corresponding reduction in demand for animal feed.

There could also be more 'greening' of general payments. A further shift of CAP payments from pillar one (direct agricultural support payments and market measures) to pillar two (rural development) would support the prioritisation of specific environmental measures based on notions of 'public money for public goods', such as low-input, organic or integrated production schemes as well as legume/protein crop increases. This shift would have potential effects on feed imports. A further option would be to reduce livestock production based on protein feed imports.

What would need to be addressed under a new post-2020 food and farm policy?

To improve the CAP's ability to mitigate deforestation, more could be achieved by amending the CAP itself than by abolishing the few remaining parts of the existing CAP that provide what are at most only modest incentives to production systems that lead to deforestation. Amendments of the CAP that work towards more strict and effective greening measures are likely to have greater leverage on livestock production and feed import volumes.

This could bring a number of advantages – not least mitigation of what is referred to as the nitrogen surplus. Excessive nitrogen concentration has several negative effects: it endangers plant diversity, causes eutrophication (promoting the growth of algae and other plant life, which take oxygen from the water, causing the death of fish and molluscs), and accelerates climate change. Farming methods used widely in the EU lead to excessive quantities of nitrogen entering the soil, water and air from a variety of sources, including animal manure and mineral fertilisers. When livestock is fed on imported protein, the manure it produces introduces extra nitrogen to the local ecosystem. Pasture-fed livestock, on the other hand, takes up nitrogen from the ecosystem (through feeding) as well as introducing it via manure, meaning the overall local nitrogen levels are more balanced.⁵⁴

Changes to the CAP could make agricultural support more strictly conditional on reducing nitrogen surpluses, improving animal health and welfare, and the efficient use of available resources. It would also act to reduce concentrate feed use in feeding rations for animal production, with an increased focus on sustainable grassland utilisation. In general, support could increasingly be targeted towards less intensive production systems such as organic production, grassland-based livestock systems or permaculture.

This would need to be accompanied by measures to reduce overall EU consumption of animal products, to achieve impact reductions at the global level rather than merely relocating negative environmental consequences through replacing domestic production with imports. To achieve truly sustainable agricultural production systems in the EU, the CAP should be linked much more to the demand side and to general food policy, meaning that it might become a common food systems policy rather than being focused on agricultural production.

What additional measures could be taken besides the CAP or a new post-2020 food and farm policy?

Additional measures could include reducing imports of livestock from countries with deforestation risk; labelling the origin of feedstock, so informing consumers and producers; increasing domestic protein feed crop production; reducing livestock production based on protein feed imports; and increasing the use of wastage, residues and by-products as animal feed.

Increasing import tariffs for forest risk commodities or lowering tariffs for sustainably produced commodities could be another policy option. At present, under international trade rules adopted in the 1960s, soy enters the EU virtually free of import duties. Raising tariffs in general may be difficult, but lowering duties –specifically for legally and sustainably produced commodities – is possible, and has been done in the past for sustainable timber under the EU’s Generalised Scheme of Preferences. Fern research published in 2015 explored how this idea could be made to work for soy products. If this approach were to be adopted, there would need to be a requirement that imports of soy into the EU could be shown to have been legally and sustainably produced.⁵⁵

5. Conclusion

The current CAP does not directly incentivise production that leads to deforestation as there are no specific subsidies for imported feedstuffs. However, some parts of the CAP, such as the beef premium and animal product related market support measures, clearly make these activities more attractive. Abandoning these payments could, therefore, result in somewhat lower livestock production, and a reduction in corresponding feed imports and the associated potential risk of deforestation.

More can be achieved, however, by amending the CAP as part of the current reform process and turn the CAP into a Food and Farm Policy. Such changes could make agricultural support conditional on reducing nitrogen surpluses, increasing animal health and welfare, and the efficient use of available resources. Such a policy would focus on measures that would lead to reduced incentives for livestock production, e.g. internalisation of external costs, support for grassland-based production systems, and increased support for organic agriculture and permaculture.

Addressing demand is critical. As long as consumers want high quantities of cheap animal products, and as long as producers are allowed to meet this demand, concentrate-based mass production of livestock will dominate. Lower consumption levels and a move towards a true circular economy will be crucial. The EU therefore needs to develop policies that reduce the consumption of forest-risk commodities, preferably as part of an EU Action Plan to address deforestation and strengthen the circular economy. Such an EU Action Plan should be based on lessons learned from the EU FLEGT Action Plan and other EU initiatives to regulate supply chains, as discussed in a recent Fern research paper.⁵⁶

This Action Plan should also elaborate possible incentives for legal and sustainable production and consumption of soy and other feedstuffs, possibly including the development of sustainability criteria for feed imports – to be negotiated and agreed with all stakeholders in producer countries. These criteria should include indicators on deforestation, respect for customary land tenure, but also on indirect land use change to address conversion. Such criteria could be used as the basis for cross compliance measures under the CAP.

In conclusion, amendments to the current CAP could contribute to reducing deforestation, but much more can be expected from a reformed CAP if those reforms focus on reduced nitrogen surpluses and increased animal health and welfare. Even then, reducing the EU's consumption of animal products is essential, and trade policies to reduce consumption and ensure the production and consumption of only legally and sustainably sourced feedstuff will be vital in order to reduce the EU's deforestation footprint.

6. Endnotes

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