



AGRI - DG Agriculture and Rural Development
B-1049 Brussels

13 February 2017

Changes to greening rules

Dear Sir or Madam,

As already indicated at several occasions in the past by the European biogas sector, the greening measures are essential for the agricultural biodiversity and sustainability, but they could become more efficient, economically profitable and flexible.

Numerous ecologically useful mixtures of plants should therefore be qualified as Ecological Focus Areas. For example, mixtures of cereals grown together with nitrogen-fixing crops provide nutrition for insects and birds. Furthermore, legumes bind nitrogen in the soil and thereby, reduce the additional demand of nutrients. The use of digestate, as organic fertiliser, would be sufficient to compensate the nutrient removal while reducing greenhouse gas emissions of fertilisation and not exhausting the soil. Another example would be the annual and perennial crop mixtures that could likewise be merely fertilised by digestate and which do not require pesticides if fermented after the growing period by anaerobic digestion, since weeds can be fermented as well and they may even lead to a higher biodiversity. In addition to biodiversity, the greening measures should strive for improved soil fertility and reduced greenhouse gas emissions.

The European Biogas Association (EBA) and the German Biogas Association (GBA) thus agree with the European Commission that allowing areas with mixtures to be qualified as ecological focus areas, provided that the predominance of the nitrogen-fixing crops is ensured, is a step into the right direction.

Qualifying perennial crops, mixed cereal cultures and annual and perennial crop mixtures as ecological focus areas and at the same time as feedstock of anaerobic digestion plants (when harvested in line with growing time requirements), would benefit the both, the profitability of the farms and the sustainability of the agricultural environment through higher biodiversity, greenhouse gas emission mitigation and avoided nutrient leakage or even reduced nutrients in the groundwater. Qualification of these crops should be aligned at the EU-level when the Common Agricultural Policy beyond 2020 is developed.

EBA and GBA support the proposal of the Commission to align also the rules related to catch and cover crops as ecological focus areas. A suitable combination of catch crops help to achieve the following advantages: break up of soil compaction, erosion control, build-up of nutrient storage, feeding of soil organisms, weed suppression, build-up of humus, fixing of atmospheric nitrogen and the preservation

of soil health and fertility. These crops provide thus additional economic benefits and increased competitiveness for European farmers.

Hence, we want to underline the important role of anaerobic digestion as a part of sustainable farming (and Common Agricultural Policy): when respecting the minimum growing periods and requirements of wildlife and biodiversity, the crops grown on ecological focus areas should be allowed to be used under restricted conditions as biogas feedstock providing ecological and economic profitability for farmers. Digesting the plant helps to avoid negative impacts: mitigate around 50% of the greenhouse gas emissions and avoid nutrient leakage¹, both taking place during the plant's rotting process. Additionally, green energy is produced alongside digestate that is an excellent organic fertiliser closing the nutrients cycle and bringing back valuable amounts of carbon.

Should you have any questions on our opinion, we will be pleased to further explain our views at a personal meeting.

Kind regards,



Dr Stefan Rauh
Chief Operating Officer
German Biogas Association
(Fachverband Biogas)



Franz Kirchmeyr
Vice-President
European Biogas Association

¹ Hartl et al.: Verluste der oberirdischen Biomasse von abfrostenden Begrünungspflanzen durch Ausgasung vor der Einarbeitung in den Boden (2010)