

EXPLAINER

POSITION ON THE FRENCH LABEL BAS-CARBONE (LOW-CARBON STANDARD) AND THE LIVESTOCK FARMING METHODOLOGY (CARBON AGRI)

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This document by the Réseau Action Climat (RAC) and its member associations aims to present the positions and necessary improvements regarding the low-carbon standard and the Carbon Agri methodology. It was produced by the Réseau Action Climat, the CCFD-Terre Solidaire, the Nicolas Hulot Foundation for Nature and Mankind and France Nature Environnement (FNE). It was supported and revised by Friends of the Earth France and Greenpeace France. This paper does not consider existing forestry methodologies.

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INTRODUCTION

The VOCAL project was launched in 2015 by I4CE. Early work resulted in the creation of a low-carbon guideline established on the basis of forestry and agriculture pilot projects. In 2018, the French Ministry for the Ecological Transition (MTES) and I4CE created the “label bas-carbone”, hereafter referred to as the low-carbon standard. Four official methodologies exist to date: three for forestry (afforestation, reforestation and improved forest management, developed by the French National Forest Ownership Centre (CNPf) and the French Institute for Forest Development) and one for agriculture (Carbon Agri, developed by the French Livestock Institute, the French National Dairy Industry Council (CNIEL),

the French National Livestock and Meat Industry Council (Interbev) and the French Federation of Livestock Producers (CNE), in partnership with I4CE. For the standard, these methodologies are sector-based variants or levers for action. Several environmental organisations such as RAC and FNE also joined the commission chaired by the MTES.

This paper focuses on the application of the low-carbon standard as an instrument and its application, as of today, in the agricultural sector. It provides an analysis and establishes recommendations for improvements.

SUMMARY OF THE RECOMMENDATIONS

Recommendations concerning the standard's environmental objectives:

- **The standard must prioritise absolute reduction in greenhouse gas emissions as a priority.**
- **The standard must be used as a means of contributing to France's climate objective, and not as an offsetting instrument¹.**
- **The standard must make a distinction between emissions reduction (i.e. decreasing quantities of greenhouse gas emissions) and sequestration.**
- **The standard must define avoided emissions so that this is not used as compensation for avoiding polluting practices which may potentially never have occurred.**
- **The standard should only be used by financers who strive to reduce emissions at source before using the low-carbon standard.**
- **The standard must not fund practices causing negative externalities and must present clear criteria regarding crop diversification and a drastic reduction in the use of chemical fertilizers and pesticides.**

Recommendations to improve the standard's regulatory framework:

- **The ministry must set out the terms of contract agreements with a view to providing a minimum protective framework for the project initiator.**
- **The State's local and regional departments must check the independence and skills of auditors when they differ from the requirements set out by the standard.**
- **The ministry must establish a centralised public register to ensure the traceability of contributions and credits.**
- **The ministry must conduct an impact study on the consequences of such a standard with regard to socio-economic, environmental and animal welfare aspects.**

Recommendations concerning the Carbon Agri methodology

- **For the ruminant livestock sector, certification should be conditioned to the transitioning to pasture rearing with a minimum of food autonomy on the holding and with exclusively outdoor grazing areas.**
- **The methodology must record for the agricultural holding all emissions from scopes 1 (direct), 2 (indirect) and 3 (the entire life cycle) and stop using the carbon intensity metric, in order to ensure the project's additionality and prevent carbon leakage risks.**
- **Like the standard, the methodology must conduct an impact study on the consequences on land prices and impacts on socio-economic aspects, biodiversity and animal welfare.**

1. <https://docs.google.com/document/d/1bcc5aVGn-AB7ZzfwgsXb4r24-B7-dZ3kEOVLhOivegc/edit>

I. THE LOW-CARBON STANDARD:

AN INSTRUMENT WHICH RISKS NOT BRINGING ABOUT A REDUCTION OF GREENHOUSE GAS EMISSIONS

I.A. GENERAL COMMENTS ON THE LOW-CARBON STANDARD

I.A.1. TO DATE, THERE IS NO PRE-REQUISITE FOR FINANCERS TO REDUCE THEIR OWN EMISSIONS AS A FIRST STEP.

In the French National Low-Carbon Strategy (SNBC), France puts forward the avoid-reduce-offset sequence and defines offsetting as “all financial and technical measures used to counteract, in part or in full, greenhouse gas emissions in the atmosphere which are caused by a specific activity and were not able to be avoided or limited.” All efforts must therefore be made to avoid and reduce greenhouse gas emissions before moving onto carbon offsetting. However, the low-carbon standard proposes an offsetting mechanism while financiers are not obliged to provide evidence of emissions reductions.

I.A.2. PROJECTS WITH INCREASED EMISSIONS CAN BE CERTIFIED.

The standard is based on a theoretical “business as usual” baseline scenario that projects a holding climate impact if nothing was put in place to reduce emissions. A project in which emissions rise every year but stay below this baseline scenario will be considered as a project enabling emissions reductions, therefore a project that can be certified as low-carbon.

I.A.3. THE STANDARD DOES NOT DIFFERENTIATE BETWEEN AVOIDED OR SEQUESTERED EMISSIONS.

According to the ministerial ruling defining the low-carbon standard baseline, “The term ‘emissions reductions’ means either quantities of GHG for which emissions have been avoided or quantities of sequestered GHG”. These terms refer to very different realities, however. **CO₂ sequestration in soils cannot amount to a reduction in emissions.** First of all, the quantity of carbon stored in the soil is very difficult to assess². **Furthermore, the carbon is not stored permanently** and the duration of storage may vary significantly and cannot always be controlled³.

Carbon storage is therefore a slow biological process that is complicated to measure and control over time. What will have been recorded as a reduction at a given time through sequestration will be cancelled out in the future in the event of re-emission into the atmosphere⁴ (due to land use changes, adverse climate events, etc.⁵). **The issue of storage reversibility is particularly significant as the standard only approves projects over a five-year period.** While one metric ton of CO₂ emitted remains in the atmosphere for at least one hundred years, to consider that offsetting has taken place, it would be necessary to ensure that the CO₂ sequestered in the

2. INRA 4p1000 study

3. SNBC 2018, on carbon sequestration in soils: “The obtained gains are reversible (natural disasters, land use changes or changes to climate conditions which may increase CO₂ emissions from the soils)”, page 190, www.ecologique-solidaire.gouv.fr/sites/default/files/2020-03-25_MTES_SNBC2.pdf (in French) or INRA, July 2019, commissioned by the French Ministry for Agriculture and Food and the French Environment and Energy Management Agency (ADEME), Stocker du carbone dans les sols français : quel potentiel au regard de l'objectif 4 pour 1000 et à quel coût ? (<https://inra-dam-front-resources-cdn.media-group.com/ressources/afile/487878-58615-resource-etude-4-pour-1000-synthese-en-francais-pdf.pdf>) (in French)

4. Land use changes and deforestation lead to CO₂ being released into the atmosphere, but this is also the case for the use of nitrogen fertilizers (cf. INRA, 2017. Assessing services provided by agricultural ecosystems to improve their management) or for certain agricultural practices such as ploughing. Furthermore, sequestration capacity in soils depends on pedoclimatic conditions specific to each region. The IPCC also points out the risks of global warming on soils' capacity for carbon sequestration.

5. Réseau Action Climat, Séquestration du carbone dans les sols agricoles en France, <https://reseauactionclimat.org/publications/sequestration-carbone-sols-agricoles> (in French)

soils remains so for at least as long. The standard proposes to counter the risk of reversibility by applying “rebates” to avoid overestimating the reality of emission reductions. This limits the quantity of credits granted by incorporating a margin of error. However, there is no long-term solution to date that can tackle this biological phenomenon which cannot be overlooked - **it is an intrinsic shortcoming to offsetting greenhouse gas emissions in the land sector (forests, agricultural land).**

By not making a distinction between sequestration and reduction, the vocabulary used in the standard causes confusion between the terms, which is detrimental to the real emissions reductions we urgently need, i.e. emissions reductions at source. In the rest of this paper, the term “emission reduction” will be written in quotation marks when used in the meaning defined by the low-carbon standard.

In addition, the low-carbon standard does not clarify the definition of an “avoided” emission, which paves the way for a misuse of the concept. Due to this, any avoided emission may be understood to be a reduction of emissions. For example, a farmer increasing feed autonomy (practice to be encouraged) would be rewarded in the same way as a farmer who does not establish new polluting practices. For example, within the Paris Agreement, the European Union prevents the term of avoided emissions being used so that Saudi Arabia cannot issue carbon credits for the non-extraction of oil - which, in this case, equates to compensating polluters for their economic losses. To date, the standard does not prevent this kind of misuse.

I.A.4. A STANDARD WITH LITTLE CONSIDERATION FOR THE ENVIRONMENT IN GENERAL AND BIODIVERSITY IN PARTICULAR.

As defined in the current ruling, the standard’s methodologies must not bring about adverse environmental or social impacts. This point is very important as the environmental and social challenges must be tackled together to ensure a fair climate transition, as France undertook to do by signing the Paris Agreement. Likewise, protecting biodiversity and climate objectives are intrinsically linked. According to the IPBES, biodiversity fosters the proper functioning of ecosystems and therefore their resilience in relation to climate change. Biodiversity is also helpful in

the implementation of agricultural and forestry practices that emit lower levels of greenhouse gases - such as the presence of organic matter in the soils which leads to a decline in the use of fertilisers. However, in its current form, the standard does not sufficiently take into account the impact of the accredited projects on biodiversity. A forestry monoculture plantation project, large-scale biogas production and an agricultural system using chemical pesticides, for example, can be accredited.

I.A.5. THE RANGE OF OPTIONS RELATED TO THE AUDITOR MAY LEAD TO CONFLICTS OF INTEREST AND RESORTING TO THE “LOWEST BIDDER”.

According to the standard, “*The Auditor can also use other means [than those proposed by the standard, editor’s note] to ensure their independence and neutrality, provided that the project initiator or representative can justify that these means are sufficient.*” Yet which skills do project initiators and representatives have to judge whether these means are sufficient? Which criteria should they base their judgement on? This is particularly of concern as the project initiator bears the cost of the audit, and there is a risk of them selecting the cheapest option. In addition, such a procedure paves the way for potential conflicts of interest.

I.A.6. CONTRACTUALISATION INVOLVES A RISK WHICH IS INSUFFICIENTLY CONSTRAINED FOR PROJECT INITIATORS.

If the project initiator cannot honour their part of the contract due to events outside of their control (e.g. fires, loss of crops requiring imports of animal feed, loss of hedgerows, etc.), the consequences will depend on the terms of the contract signed. A project initiator runs the risk of having to reimburse part of the money collected if the “emission reductions” that had been forecast are ultimately not achieved. Yet many project initiators will decide to opt for a government accreditation to avoid having to individually seek legal advice and as they place their trust in the institution. However, there is no framework for the terms of the contract proposed by the standard, and therefore no guarantee of a minimum of protection for the project initiator in the case of unforeseen events, which may result in farmers

I.B. THE CARBON AGRI METHODOLOGY DOES NOT BRING ABOUT A TRANSITION TO AN AGRICULTURAL SECTOR WITH LOWER GREENHOUSE GAS EMISSIONS, AND EVEN LESS ONE THAT FAVOURS AGROECOLOGY

In this section, we will set out what we believe to be the shortcomings of this methodology in terms of the objective to reduce greenhouse gas emissions and of its serious lack of a systemic approach. Naturally, some may say that a systemic approach is not the aim of a “low-carbon” standard. Yet it is essential that a certain number of criteria are taken into account (biodiversity, economic and social aspects, etc.) so that climate objectives are actually reached and can be sustained over the long term. The Carbon Agri⁶ methodology does state that “it is impossible to isolate aspects of the climate challenge from other environmental issues (biodiversity, water quality, etc.)”. Unfortunately, this statement has not been put into practice by the methodology, in contradiction with a number of public policies.

I.B.1.

THE CARBON AGRI METHODOLOGY REWARDS INITIATIVES WHICH ONLY MARGINALLY REDUCE GREENHOUSE GAS EMISSIONS

Let us look at livestock farming, the agricultural sector with the highest level of emissions. Direct emissions related to livestock farming can be broken down in France as follows: out of the agricultural emissions recorded in 2017 (86 MTeCO₂), 44 MTeCO₂ are caused by enteric fermentation and 12 MTeCO₂ by livestock manure⁷. To this, we must add emissions related to the production of animal feed, whether imported from another country, another farm holding or produced on the holding itself (soil management, use of nitrogen fertilizers, etc.).

6. www.ecologie.solidaire.gouv.fr/sites/default/files/M%C3%A9thode%20C3%A9levages%20bovins%20et%20grandes%20cultures%2028Carbon%20Agri%29.pdf (in French)

7. Citepa, Kyoto scope, 2017 figures.

The optimisation measures proposed by the Carbon Agri methodology such as working on enteric fermentation by changing ruminants' food rations only marginally reduce greenhouse gas emissions⁸. Regarding emissions from livestock farming, the main levers to reduce greenhouse gas emissions are the overall reduction of herds and improved autonomy for animal feed. However, the former is not taken into account in the methodology and the latter is only considered in a very limited way.

A study published by INRA in 2013 considered the abatement potential of ten technical initiatives, several of which are found in the Carbon Agri methodology (better use of mineral fertilizers, increasing the share of legumes, working on ruminants' food rations, developing biogas production, reducing fossil fuel consumption in agricultural buildings and machinery, etc.). The conclusion demonstrates that, even added together, these improvements in practices only reduce France's agricultural greenhouse gas emissions by 9%, while the sector is the third largest cause of emissions on a national scale. Without questioning our agricultural model, without making decisions on the size of herds and the ways in which animals are fed, in particular the role of pasture grass for ruminants, the agricultural sector will never reach the objective of a 46% reduction in greenhouse gas emissions in less than thirty years as set by the SNBC in 2018.

Furthermore, project initiators are not obliged to roll out a minimum of levers or reach a minimum of "emission reductions" for their project to be accredited. A farmer can propose a project that will only "reduce" emissions by 2%, and can be certified by the low-carbon standard.

Here are a few examples:

- installing anaerobic digesters alone is sufficient for a farm to achieve low-carbon accreditation.
- regarding the use of fertilizers, the methodology conditions access to the standard to the nitrogen threshold required by law for vulnerable areas. To bring about a reduction above this threshold, it sets no quantified target, which means that it is not possible to ensure projects' compatibility with the SNBC. The livestock farmers who initiate a project are not obliged to implement grazing land, so holdings with no pasture may be awarded low-carbon accreditation for their project. This is an aberration as we know the positive role that permanent and semi-permanent

grasslands play in carbon sequestration, animal welfare and also biodiversity.

Lastly, many levers are chiefly aimed at economic optimisation and not at emissions reduction. For example, the methodology states that the "optimising concentrates" lever aims to "reduce the cost of feed" and the "reduce the number of unproductive animals" lever strives to "reduce the cost of heifer rearing"¹⁰.

Offsetting projects in agriculture structurally favour optimisation practices. Carbon credits alone are not sufficient to provide an attractive income compared to economic gains from optimisation practices. The most interesting levers for an agricultural transition in accordance with climate objectives, such as improving feed autonomy – even risk being disincentivized by offsetting mechanisms. These practices tend to be costlier than optimisation practices, which would lead farmers to negotiate higher carbon revenues, while investors, in the competitive market of carbon credits, have no interest in paying more for their credits and will turn to other offsetting projects. In this context, farmers have no interest in implementing the practices that require higher investments than others.

I.B.2. THE CARBON AGRICULTURE METHODOLOGY IS BASED ON SIMPLIFIED AND EVEN INCORRECT INDICATORS: THE PROBLEMS OF "CARBON INTENSITY" AND A FOCUS ON THE CARBON METRIC.

The indicators used by the Carbon Agri methodology are relative performance indicators based on the quantities of greenhouse gas emissions per production volume. These indicators are used to optimise productions' emissions without necessarily reducing the total quantities of greenhouse gases emitted. The Carbon Agri methodology, rather than recording the changes in greenhouse gas emissions for a holding or sub-sector/sector, rewards **changes in carbon intensity** for the various sub-sectors, i.e. the quantity of greenhouse gas emissions per production unit. **Such an indicator favours the most intensive and productive holdings** but penalises the smaller holdings and farms with low livestock densities. The latter holdings and farms are compatible with the agricultural models we must move towards to

8. Measure 8 analysed in this INRA publication - <https://www.inrae.fr/sites/default/files/pdf/etude-ges-synthese-version-anglaise-final.pdf>

9. INRA, 2013. How can French agriculture contribute to reducing greenhouse gas emissions? Abatement potential and cost of ten technical measures <https://www.inrae.fr/sites/default/files/pdf/etude-ges-synthese-version-anglaise-final.pdf>

10. Carbon Agri methodology p13.

11. Afterres2050

meet our climate targets¹¹, compatible with a reduction in herd sizes but able to produce quality meat, favouring fair remuneration for farmers, agro-ecological infrastructure which can sequester carbon, greater respect for animal welfare and biodiversity protection, etc. The use of such an indicator obscures a potential “carbon leakage”, for example if a holding expands and increases its emissions - a practice of which the authors of the methodology are aware: *“Using the concept of carbon intensity allows monitoring carbon gains, irrespective of changes of holding sizes during the project, at a time when the trend has been to extend holdings and regularly reduce the number of farmers for the last sixty years”* (p7). This does not demonstrate the **additionality** of projects, as a reduction in carbon intensity does not automatically mean a reduction in the agricultural holding’s emissions. While the standard is primarily aimed at farmers who have a long way to go to improve their practices - those who are already implementing best practices will find it more difficult to obtain remuneration or certification as additional practices must be proposed to achieve this. The standard does not appear sufficiently solid to bring about significant progress.

The lack of a comprehensive indicator in the methodology does not encourage far-reaching changes in agricultural practices; even less does it call into question the production model. The methodology is based upon life cycle analysis that only accounts for CO₂ and does not consider biodiversity issues. Some agricultural practices which are good for the climate, i.e. which bring about a significant reduction in direct and indirect greenhouse gas emissions, are taken into account in the standard. This concerns in particular permanent and temporary grasslands, agroecological infrastructure and legume crops. However, it is unfortunate that they are not afforded greater importance (in terms of volume or an obligation to incorporate them into the project for example). The assessment of the impact on biodiversity is a non-binding requirement, and the methodology rewards a potential increase in this but does not tackle any negative impacts on biodiversity¹².

I.B.3. A MAJOR SHORTCOMING REGARDING THE REDUCTION IN IMPORTED EMISSIONS

The two main greenhouse gas imports for the agricultural sector are firstly imports of nitrogen products and imports of the raw materials required to produce nitrogen fertilizer in France¹³ and secondly imports of soya-meal¹⁴.

According to the appendix of the ruling, the methodology must take into account indirect emissions through the reduction of emissions related to the production of nitrogen fertilizers or the accounting of fuel or electricity purchases. However, the main indirect emissions related to livestock farming (feed imports resulting in particular in imported deforestation) are not taken into account. Even though protein autonomy is encouraged, a minimum threshold has not been set to allow for certification. A holding that imports cattle cake, the production of which directly contributed to the deforestation of fragile ecosystems in Latin America, can be accredited with the low-carbon standard.

I.B.4. A LACK OF METICULOUSNESS IN IMPLEMENTATION: BASELINE SCENARIO AND ON-SITE CHECKS

Individual assessments may be conducted at the latest four years following project launch, with, until this time, the baseline scenario considering “a theoretical situation of the project’s absence” (ruling II.C.1). This theoretical situation is based on a baseline scenario of the holdings’ carbon intensity, therefore a baseline scenario which promotes optimisation and not emissions reduction.

Lastly, a project may be accredited without having once been subject to on-site checks¹⁵.

12. Methodology page 15

13. www.reseauactionclimat.org/wpcontent/uploads/2017/09/agriculture-emissionsindirectes-engraisazotesmineraux-rac-2017-09-11-final.pdf (in French)

14. E&E, on behalf of the Réseau Action Climat, 2015. Quantification des émissions de gaz à effet de serre contenues dans les produits importés et exportés des secteurs de l’agriculture et de l’agroalimentaire

15. On-site checks are expressed in the conditional form in the methodology, and one option, which is likely to be preferred in the future (as the standard moves towards a system in which representatives manage aggregated project portfolios), is assessments through random sampling (p.17).

I.B.5.

A CARBON AGRI METHODOLOGY WHICH IS NOT IN LINE WITH THE STANDARD'S REQUIREMENTS

The low-carbon standard states that the methodologies approved must comply with certain criteria, in particular that of not causing adverse socio-economic consequences. As we have demonstrated above for biodiversity, this is not the case for the Carbon Agri methodology. Despite the pre-requisites of the method, the Carbon Agri methodology does not require conditions concerning water consumption, the use of chemical fertilizers and pesticides (which cause pollution and health issues), animal welfare, fair remuneration for farmers, etc. For example, no maximum share of water consumption authorised for maize crops is specified although irrigation systems are part of the most energy-intensive equipment used on a holding.

I.B.6.

COULD THE CARBON AGRI METHODOLOGY HAVE AN ADVERSE IMPACT ON FARMERS?

Some of the practices promoted by the Carbon Agri methodology may have adverse effects on farmers. For example, there is a risk of encouraging an increase in surface area allocated to biogas production to the detriment of intermediate crops for animal feed (barley, oats, etc.). The development of biogas production may also put downward pressure on the prices of products derived from animals¹⁶. This is dangerous for livestock farmers who are already struggling to sell their meat and milk at prices above their production costs. In this way, the Carbon Agri methodology encourages a practice for which there is not yet a sufficient regulatory framework and its long-term viability, as things stand, is challenged by those concerned¹⁷.

Moreover, putting the changes to agricultural practices into the hands of financiers gives rise to financial insecurity for farmers as the amount of income (dependent on the price per metric ton of carbon) and their actual payment are uncertain. Representatives appear to be well aware of these uncertainties, as the Chairperson of the France Carbon Agri association, which acts as an intermediary between farmers and financiers, claims: "The remuneration of the 391 livestock farmers already committed to the approach must be guaranteed"¹⁸. A genuine public policy transition, such as through the income of the Common Agricultural Policy (CAP), would not place such a burden of uncertainty on farmers.

16. While dairy farmers gain additional revenues thanks to a biogas unit, there is a probable risk that they lower milk prices to increase their competitiveness.

17. www.wwf.fr/sites/default/files/doc-2020-03/20200317_Rapport_Methanisation-agricole_WWF_GRDF-min.pdf (in French)

18. www.lafranceagricole.fr/actualites/elevage/elevages-bovins-le-premier-contrat-de-vente-de-carbone-est-signe-1.13.3252382285.html (in French)

THE 4 PER 1000 INITIATIVE: FRANCE, LEADER OF OFFSETTING IN AGRICULTURE ?

The international 4p1000 initiative, launched by France during COP 21 in 2015, is struggling to shift from pilot projects to large-scale development¹, particularly due to a lack of financial support². In addition to having similar shortcomings to those concerning the “label bas-carbone”, the project leaders decided to solve the issue of project financing by generating carbon credits.

PROBLEMS SIMILAR TO THOSE OF THE LOW-CARBON STANDARD

- An initiative which does not foster emission reductions. The 4p1000 initiative aims to promote carbon sequestration in agricultural soils, without considering the need to reduce GHG emissions at source. The initiative is even willing to support projects that have no climate impact, as it sets the thresholds that any increase in CO₂ emissions must not be greater than the quantities sequestered[3].
- As the focus is only on the variable of carbon sequestration in soils, preference is not given to any agricultural model. Yet all agricultural models are not equal in terms of the climate transition, and the advantages of sequestered carbon run the risk of being quickly cancelled out if the initiative promotes industrial agriculture based on exports. 4p1000 supports for example a project by the subsidiary of Land O’Lakes (venture 37 - which claims to be agrobusiness)[4], which encourages agriculture operating soil conservation, dependent on the sales of seed compa-

nies⁵ and focused on exports⁶ in the Beira Corridor in Mozambique. At the same time, 4p1000 supports agroecology and agroforestry⁷.

- Weak socio-environmental criteria: The initiative states a number of major principles and international objectives with which a project must comply, without giving details on their implementation, assessment or the existence of appeal procedures for populations which may be adversely affected by 4p1000 projects. Biodiversity is only taken into account to a very limited extent, as project initiators must only protect already protected areas, endangered spaces and heritage lands - and not ordinary biodiversity.

FROM THE PROMOTION OF CARBON SEQUESTRATION TOWARDS CARBON OFFSETTING

- 4p1000 launched its 2050 strategy aimed at “certifying 4p1000” several carbon offsetting systems for a massive use by farmers and foresters by 2050⁸.
- 4p1000 is already promoting carbon offsetting projects. It supports for instance the Mount Helgon project by Livelihoods venture, an organisation created by Danone and Mars, in Kenya⁹. This project generates carbon credits based on increases in milk production...¹⁰

1. <https://www.4p1000.org/events-4-1000-initiative>

2. Round table 4, North America webinars.

3. Reference criteria and indicators for project assessment.

4. https://www.4p1000.org/sites/default/files/francais/report_1st_call_of_project_assessment_v2.pdf

5. https://beamexchange.org/uploads/filer_public/9a/46/9a4631c2-d421-48b5-856e-19cf625524c3/land_olakes_rama-bc_fy19_annual_report_oct2018-sept_2019_compressed.pdf

6. www.landolakesventure37.org/who-we-are

7. www.4p1000.org/

8. https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&cad=rja&uact=8&ved=2ahUKewitocrxpOTsAhVTA2MBHcNiAF4QFjACegQIARAC&url=https%3A%2F%2Fwww.4p1000.org%2Fsites%2Fdefault%2Ffiles%2Ffrancais%2Fstrategic_plan.pdf&usq=AOvVawIjnvEY75L3g3J9H8kVISMl

9. <https://www.livelihoods.eu/press-release-firmenich-and-veolia-join-the-livelihoods-fund-for-family-farming/>; www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&ved=2ahUKewjExpXJvOPpAhUQdxoKHYOnBFsQFjAAegQIBBAB&url=https%3A%2F%2Fwww.4p1000.org%2Fsites%2Fdefault%2Ffiles%2Fenglish%2Fnewsletter4_28_06_2019_en.pdf&usq=AOvVaw3bG7zVqrCCSGEosnJ9XyVC; www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&ved=2ahUKewjExpXJvOPpAhUQdxoKHYOnBFsQFjAAegQIBBAB&url=https%3A%2F%2Fwww.4p1000.org%2Fsites%2Fdefault%2Ffiles%2Fenglish%2Fnewsletter4_28_06_2019_en.pdf&usq=AOvVaw3bG7zVqrCCSGEosnJ9XyVC

10. www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&cad=rja&uact=8&ved=2ahUKewjE0q6pv-PpAhXHz4UKHfcmBsMQFjAAegQIBB&url=http%3A%2F%2Fwww.livelihoods.eu%2Fwp-content%2Fuploads%2F2016%2F10%2FLivelihoods_Mt_Elgon-Brochure_A4.pdf&usq=AOvVaw-OSixYsn07Kpb9-nie-WjOJ

II. RECOMMENDATIONS FOR IMPROVEMENTS AND RED LINES

As it stands, and for the reasons discussed above, our organisations confirm that this standard is not a lever which will contribute to France's climate efforts, and may even be detrimental to other objectives such as those related to biodiversity and the essential transformation of our agricultural production systems.

Such an instrument cannot be used as it is. Instead, it is crucial to invest in public policies and measures which provide massive support for an in-depth shift to agroecological systems. The real levers are found in changes to public policies to improve incomes and restore value to the sector through the agroecological transition (reallocation of the CAP budget to maintaining and developing agroecology, including organic agriculture, setting up payments for environmental services,

implementing market regulation tools and improving the distribution of value from upstream to downstream, etc.).

However, the implementation of major structural changes within the low-carbon standard and the Carbon Agri methodology may result in an instrument that contributes to the conversion of agricultural systems to agroecological systems.

II.A. RECOMMENDATIONS ON THE IMPROVEMENT OF THE LOW-CARBON STANDARD

Recommendations concerning the standard's environmental objectives:

- **The standard must strive towards an absolute reduction in greenhouse gas emissions as a priority.** To achieve this, the reduction pathways must be clearly defined for the emissions of the sectors concerned by the standard in order to contribute to France's climate objectives.
- **The standard must be used as a means of contributing to France's climate objective, and not as an offsetting instrument.** This is crucial to prevent financiers from cancelling their emission efforts and the standard becoming a greenwashing tool.
- **The standard must make a distinction between emissions reduction (i.e. decreasing quantities of greenhouse gas emissions) and sequestration.** Carbon sequestration in agricultural soils cannot be claimed to be equivalent to a reduction in emissions.
- **The standard must define avoided emissions** so that this does not retribute the non-occurrence of polluting practices which may potentially never have occurred.
- **Financiers must strive to reduce emissions at source before using the low-carbon standard.**
- The standard must above all reward a shift in practices to models that benefit the climate, while having **co-benefits for biodiversity and human and animal welfare.** Thus, the standard **must not reward practices causing negative externalities** and must present clear criteria regarding crop diversification and a drastic reduction in the use of chemical fertilizers and pesticides.

Recommendations to improve the standard's regulatory framework:

- **Set out the terms of contract agreements clearly** so that the burden is fairly distributed in the event of a problem in the performance of the contract outside of the farmer's control (fire, natural disaster, etc.). The ministry must provide a framework of minimum protection for the project initiator who does not necessarily have access to legal guidance, for example by creating a guarantee fund.
- To counteract **the low level of precautions related to the auditor**, the State's local and regional departments must check **the independence and skills of auditors** when they differ from those set out by the standard.
- **Establish a centralised public register to ensure the traceability of contributions and credits.**
- **Conduct an impact study on the consequences of such a standard with regard to socio-economic, environmental and animal welfare aspects.** The impact study starts one year after the first projects and is renewed every three years. In the event of negative socio-economic, environmental or animal welfare impacts, the low-carbon standard and existing methodologies must be amended.

II.B. RECOMMENDATIONS CONCERNING THE CARBON AGRI METHODOLOGY

- **For the ruminant livestock sector, certification should be conditioned to the transitioning to pasture rearing with a minimum of food autonomy on the holding and with exclusively outdoor grazing areas;** this would prevent the drift to intensification which is supported in the current methodology.
- **The methodology must record for the totality of the holding's emissions** from scopes 1 (direct), 2 (indirect) and 3 (the entire life cycle) and stop using the carbon intensity metric, in order to ensure the project's additionality and prevent carbon leakage risks.
- Like the standard, the methodology must **conduct an impact study on the consequences on land prices and impacts on socio-economic aspects, biodiversity and animal welfare.** The impact study begins as of the first year of the project and is renewed every three years for the duration of the project and the accreditation. In the event of adverse socio-economic, environmental or animal welfare impacts, the project and the accreditation are cancelled.

III. CONCLUSIONS

- **As it stands, the Carbon Agri methodology is not in line with the greenhouse gas emissions reduction objective of -46% by 2050 (as set by the SNBC 2) and which provides in particular for a decline in herd sizes. If this is not improved quickly, the Carbon Agri methodology will boil down to a greenwashing tool.**
- **The Carbon Agri methodology does not bring about any structural or systematic changes to agricultural practices and must not be implemented to the detriment of public policies and measures that are absolutely necessary for the agricultural sector. These actions must both support the continuation of best practices and bring about the transition, particularly through massive support in the form of public assistance to maintain and develop agroecology, including organic agriculture, assistance for farmers and farmers' collectives to set up agroecology including organic agriculture, assistance for the transmission of holdings and fair remuneration for farmers.**
- **Difficulties regarding reversibility and measurement specific to the land sector are problematic for carbon offsetting. In order to reach our climate objectives, we need to take these shortcomings into account and provide a proper framework for the use of the "carbon contribution" under the standard.**
- **This standard must not be open to carbon markets. A change to the standard which would allow the resale of carbon credits would result in a greater risk of land speculation and therefore project initiators would struggle to acquire land. This would also increase the risk of greenwashing.**
- **However, if the recommendations described above are fully implemented, this low-carbon standard and the Carbon Agri methodology could be appropriate instruments to support the transition.**

Réseau Action Climat - France is an association under the French law of 1901 founded in 1996 and focused on climate change. It is the French representative of Climate Action Network International (CAN-I), a global network of more than 1,500 NGOs around the world. A federation of 36 national and local associations, it fights the causes of climate change, from the local to the international level, and aims to encourage governments and citizens to take action to limit the impact of human activities on the climate.

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