



21 April 2022

## **Written preliminary remarks on the CSP list of observations for the Danish Strategic Plan**

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Dear Wolfgang Burtscher,

Denmark would like to thank the Commission for their observations on the Danish Strategic Plan and we look forward to the continued dialogue in order to ensure a timely approval of the Plan.

Denmark welcomes the Commission's efforts to find solutions to the severe consequences of the war in Ukraine. One of them potentially being a global food crisis. Denmark fully agrees with the Commission that the EU must play a key role in stabilizing the agricultural markets.

Denmark notes with satisfaction that the Commission acknowledges the completeness of the Plan. In addition, Denmark welcomes the fact that the Commission considers that the Plan has the potential of contributing to the general objective of fostering a smart, competitive, resilient and diversified agricultural sector. Furthermore, Denmark welcomes that the Commission finds that the Plan has the potential to deliver an increased ambition and higher contribution to environmental protection, including biodiversity and climate action.

The proposed interventions of the Plan are based on a broad political agreement in the Danish Parliament from October 2021 on the green transition of the Danish agricultural sector. The agreement ensures that the agricultural and forestry sector in Denmark delivers a substantial contribution to the national target of reducing greenhouse gas emissions by 70 percent in 2030, as stated in the Danish Climate Law.

The agreement contains a binding climate target for the agricultural and forestry sector of 55 to 65 percent CO<sub>2</sub>e reduction in 2030, compared to the emissions in 1990. The initiatives include activities such as restoration of peatlands, greenhouse gas emission reducing requirements for the husbandry sector and more green areas and forests.

Moreover, the agreement includes substantial investments in developing crucial climate change mitigation technologies such as research on methane reducing feed additives to livestock, even more efficient handling of manure on farms and fields as well as pyrolysis, which can transform agricultural residues to fuel and biochar. Biochar enables storage of carbon in the soil instead of being emitted to the atmosphere as CO<sub>2</sub>.

Furthermore, the agreement includes measures that will reduce the nitrogen discharge to coastal waters by over 10,000 tonnes in 2027 and hence links to the obligations according to the EU Water Framework Directive. A new and more cost efficient regulatory set-up for reducing the nitrogen emissions to the

environment will be developed over the coming years. Measures and initiatives that can address nitrogen and greenhouse gas emissions in a synergetic way will be the focus in the development process.

Denmark notes that the Commission identifies a need to revise certain elements of the Plan. In some instances, the Commission asks for more detailed descriptions or additional information on for example national initiatives. In addition, the Commission suggests that further analyses are carried-out on a number of issues.

Denmark will look into the specific observations and identify how they can be addressed accordingly in order to further substantiating the strategic choices made in the Plan.

Denmark notes that the Commission requests several new elements and in a number of cases invites Denmark to consider new interventions in addition to those already decided. As we have noted previously in relation to the Commission's recommendations for drawing up the strategic plans, some strategic choices have been necessary to make due to, inter alia, the number and scope of the Commission's recommendations, the many objectives of the Common Agricultural Policy and the budget available.

In addition, other tools than the Common Agricultural Policy are available such as national regulation, research and development and should be deployed as described above. In light of this, some of the targets are addressed outside the strategic plan on agricultural policy for Denmark. It is important to underline, that the content of the Plan reflects strategic choices, which have been taken to carefully balance and complement various considerations. The strategic choices taken in relation to the implementation of the Common Agricultural Policy should be considered in close connection with national initiatives and instruments.

The Common Agricultural Policy is only one instrument out of many when addressing the political objectives for the agri-food sector in the coming years including the green transition and the reduction of the environmental and climate impact from the sector.

Denmark will look into the Commission's observations and consider redesigning interventions when possible and needed. We kindly request the Commission to forward the observations regarding the control and penalty system (sections 7.3, 7.4 and 7.5) as soon as possible.

On a final note, the Commission observes that the proposed implementation of GAEC 7 is not in accordance with the Strategic Plan Regulation. Denmark is of the opinion that the Plan submitted to the Commission complies with the legal requirements. Denmark looks forward to a constructive dialogue with the Commission in order to find an appropriate solution.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Louise Piester', written in a cursive style.

Louise Piester