

D10.1

Carbon farming policy assessment

Document Type (R/Dem/Dec/Other)

R_Report

Dissemination Level (Pu/Co/Ci)

Pu_Public

Document information

Document history			
Issue	Date	Comment	Author
V1	31/07/2025	1 st version	Sabine Reinecke (FiBL CH)

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Document distribution		
Issue	Date	Distributed to
V1	31/07/2025	European Commission

Verification and approval		
	Date	Name
Verification final Draft by WP leader	28/07/2025	Lisa Sinnhuber (IFOAM EU)
Approval Final Deliverable by coordinator	30/07/2025	Giulia Moretto (FiBL EU)

Disclaimer and acknowledgements


“This project has received funding from the European Union’s Horizon Europe Research and Innovation programme under Grant Agreement No 101136880”.



**Funded by
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Project funded by

 Schweizerische Eidgenossenschaft
Confédération suisse
Confederazione Svizzera
Confederaziun svizra
Swiss Confederation

Federal Department of Economic Affairs,
Education and Research EAER
State Secretariat for Education,
Research and Innovation SERI

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List of abbreviations

Abbreviation	Definition
AECMs	Agri-environment-climate measures
AKIS	Agricultural Knowledge and Innovation System
CAP	Common Agricultural Policy
CCBS	Climate, Community and Biodiversity Standards
CRCF	Carbon Removal Certification Framework
CSRD	Corporate Sustainability Reporting Directive
EAFRD	European Agricultural Fund for Rural Development
EAGF	European Agricultural Guarantee Fund
EEA	European Environmental Agency
ESR	Effort Sharing Regulation
ESRD	European Sustainability Reporting Standards
ETS	EU Emission Trading System
FiBL CH	Research Institute of Organic Agriculture FiBL, Switzerland
GAECs	Good agricultural and environmental conditions
GHG emissions	Greenhouse gas emissions
IFOAM	International Federation of Organic Agriculture Movements
IPCC	Intergovernmental Panel on Climate Change
LULUCF	Regulation for Land Use, Land Use Change and Forestry
MRV	Measuring, Reporting and Verification
MS	Milestone
OCNET	OrganicClimateNET project (and project consortium)
R&I	Research and Innovation
VCM	Voluntary Carbon Market
WP	Work Package

Executive Summary

EU agriculture plays a triple role in climate change: (i) being affected by shifts in climate; (ii) contributing (11%) to GHG emissions, and (iii) as solution provider for mitigating climate change through considerable additional co-benefits. For the EU, organic farming is generally a key system for achieving its climate targets in the land-use sector. Coined “organic climate farming”, the OrganicClimateNetwork investigates and pilots approaches that systematically integrate organic farming principles with climate farming practices. The deliverable at hand, is a narrative analysis of relevant policies to support organic climate farming in the EU further. The review study maps out key EU policies and reflects their relevance in implementation drawing on stakeholder experience in the project. In this effort, the report reviews a diverse set of (support) policy mixes for fostering organic climate farming,

more *directly*, i.e. clustered around the three key environmental objectives:

- climate mitigation
- adaptation
- and biodiversity co-benefits

as well as more *indirectly* concerning policy frameworks or regulations focused on:

- carbon assessments
- standards and certification
- capacity building and education (AKIS), as well as
- support of business development or economic viability

Although numerous policies support and incentivise the uptake of sustainable practices, including through methodological guidance and standards, it remains questionable whether these policies together unfold as fully integrated and ambitious in practice and incentivise the uptake of organic climate farming at scales.

Our report reaffirms the critical role of piecemeal, compartmentalization, and thematic fragmentation as well as lacking ambition and political commitment in all policy areas from financial support to AKIS. Inconsistencies and goal conflicts become particularly obvious when looking at support for organic climate farming from a broader policy landscape perspective in policy mixes.

Organic does not receive the recognition of its multiple services to society. The system-based approach is structurally disadvantaged in singular-practice based financial support schemes particularly under CAP. A pertaining problem is the rigid and narrow approach to ‘additionality’ both in carbon accounting under CRCF and concerning double funding principles under CAP. In addition, as to address the high transaction costs for MRV solutions are required that make use of the considerable scope for integrating monitoring or data reporting more generally across different policy arenas and rewarding schemes. Legal insecurity about the future architecture currently does not motivate farmers to improve practices as first movers. This poses an ethical problem for the future development of the sector and leads to inaction and paralysis.

1 Introduction

Agriculture plays a triple role in climate change. (i) It is directly affected by shifts in climate, for example, through changing growing conditions or extreme weather events resulting in droughts and floods. Climate change threatens agricultural productivity, especially in Southern Europe, where heatwaves, droughts, and erratic rainfall are reducing crop yields — wheat, maize and olives may decline by 10–50 % depending on the scenario (Calvin et al./IPCC AR6, 2023). By contrast and (ii), it also contributes to GHG emissions, with around 11% in the EU, largely from livestock (methane) and fertiliser use (nitrous oxide) (EEA, 2023). However, agriculture is (iii) also a solution provider for mitigating climate change, often achieved through nature-based solutions that not only reduce emissions or store carbon through sequestration, but also provide additional co-benefits such as improved soil resilience, water storage capacity and biodiversity.

In terms of mitigation, agriculture plays a major part in achieving the EU climate neutrality goal by 2050, contributing to around 11% to total EU GHG-emissions ([EEA Data & Maps](#)). A key focus is on the removal potential of the land use sector. This is reflected in the clear absolute net removal target of 310 Mt of carbon already by 2030 in the Land Use, Land Use Change and Forestry Regulation (LULUCF Regulation, [\(EU\) 2018/841](#)). Additionally, the EU has set the goal of climate neutrality of the sector by 2035. Specifically, the EU recognizes 1) organic farming as a central sustainable farming practice that needs to be further developed (Farm to Fork Strategy) and 2) the need to maintain, manage and enhance natural sinks in the long term and protect and restore biodiversity (EU Climate Law, [Regulation 2021/1119](#));

For the EU, organic farming plays a key role in achieving these targets in the land-use sector. According to the EU [Communication](#) on the EU Organic Action Plan, the production system promotes “a number of management practices that support climate change mitigation with additional co-benefits for the environment and biodiversity”. The Communication also portrays organic as a spearhead for transitioning to sustainable farming more generally with the expectation “to lead by example” (Axis 3 “Organic Leading by Example”). Organic agriculture avoids synthetic (fossil fuel based) fertilisers and pesticides, promotes soil carbon sequestration, and enhances biodiversity while improving resilience to climate extremes through more diverse crop rotations and healthier soils, among other things (see EU [Communication](#)). The EU has set the ambitious target to increase the total agricultural land under organic farming until 2030 by up to 25%.

The EU has launched several policies to foster climate-farming practices more or less directly, spelling out agriculture-specific national targets for Land Use, Land Use Change and Forestry (LULUCF) or indirectly through mandating corporate sustainability reporting (CSRD) for companies above a certain size on their climate impact, including scope 3 emissions (indirectly occurring in value chains). Affected companies along agricultural value chains are demanding climate-relevant information from the farms along their chain (Witt et al., 2025).

Carbon farming has emerged as a results-based approach that aims to compensate farmers for certified carbon removals, either through public standards or via public and private carbon (or more precisely, carbon removal) trading schemes. The EU currently places significant expectations into carbon farming and has adopted the first EU-level certification framework for permanent carbon removals, carbon farming and carbon storage in products ([Climate-KIC; EU Communication](#) “Sustainable Carbon Cycles”; [Council of Europe](#), 2024).

Carbon-farming has been facing a range of criticism, considering possible methodological flaws and general uncertainties around soil carbon storage and emissions concerning additionality, permanence, and storage capacity (UBA, 2025). Moreover, carbon certification requires high standards and continuity. The Monitoring, Reporting and Verification (MRV) for nature-related processes which will form the foundation for ‘result-based’ payments is complex and expensive to measure. The multiple different (public and or private) financing and MRV-Systems developed add to the complexity, while reducing profitability for farmers. Non-farming actors often drive the financial side of carbon farming ignoring farmer needs or practical challenges, leading

to prices that do not cover extra efforts for farmers (Paul et al., 2023). For existing carbon offsets schemes in voluntary markets, it is suggested that the system holds principally only limited, or even non-existent, economic benefits for farmers (Barbato & Strong, 2023). The generally low motivation to implement (additional) carbon farming methods may be even worse for organic because of the limitations to further reduce emissions or store more carbon. In OCNET and building on the work performed in the Horizon Europe sister project [Climate Farm Demo](#), a short list of priority organic carbon farming practices was developed that covers possible practices that are promising from a multi-dimensional and integrated perspective (see **Error! Reference source not found.** for different farming systems).

Table 1. Summary of representative organic climate farming practices with high applicability score. Source: OCNET Deliverable 4.1.

Practice	Primary climate benefit	Applicable farm type	Overall score (0-1)
<i>Switch to renewable electricity</i>	Mitigation	Arable, Permanent crops, mixed/Livestock	0.89 (High)
<i>Extensification of peatlands (re-wet or reduce use of peat soils)</i>	Mitigation	Arable, Permanent crops, Mixed/Livestock	0.88 (High)
<i>Plant shade trees on pasture</i>	Adaptation / Mitigation	Mixed/Livestock	0.88 (High)
<i>Extend permanent grassland area</i>	Mitigation	Arable and Mixed/Livestock farms	0.84 (High)
<i>Improve insulation of farm buildings</i>	Adaptation & Mitigation	Arable, Permanent crops, Mixed/Livestock	0.73 (Moderate)

The practices cover a subset of a range of practices from the OCNET catalogue on climate farming practices (OCNET deliverable 4.1) with potential application for different farm contexts and strategies. The ‘Overall Score’ (range 0 to 1) reflects the relative favourability of the practice under default scoring weights considering not only the qualitative mitigation potential (40%), but also aspects like reliability (ready to deploy, 10%), operational or investment costs (25%), time horizon of implementation (5%) or risk factors (10%) and co-benefits (10%). Higher scores (close to 1) indicate a more beneficial and feasible practice in general terms. For the organic sector the challenges create major fairness issues, because historical achievements in building up soil organic carbon limit the additionality and further storage capacity considerably and with that the overall economic viability of carbon farming for organic farmers (IFOAM, 2022).

Considering these challenges, it remains an open question as to what extent the existing and planned political framework are ‘fit for purpose’ concerning the organic reality and needs and aligned with actual political objectives regarding the pioneering role of organic in the transition to sustainable farming in Europe. On the political level, a general mismatch is diagnosed between EU-goals and how countries translate their shared efforts into national policies and ambition (Di Lallo et al. 2024). Moreover, the strong focus on mitigation risks blinding out other important sustainability dimensions that systemic approaches to farming, like organic, provide: Adaptation, biodiversity conservation, water cycling and other ecological services of high value to the overall resilience of the sector (EEA, 2019). It is therefore essential that policies in support of climate farming are reflective of the integrated nature of multiple dimensions of sustainability in agriculture.

Organic Climate Farming in OrganicClimateNET

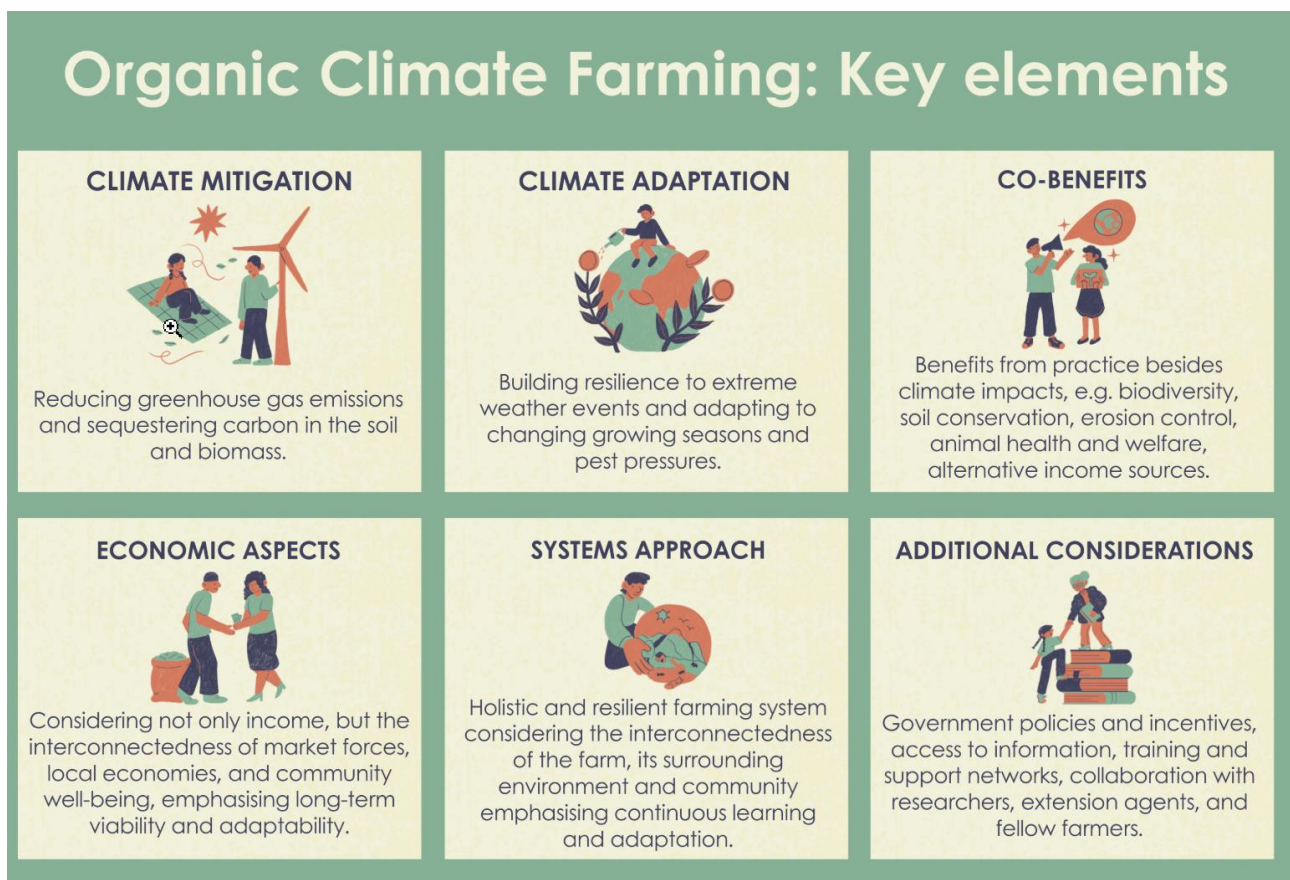
Within the OrganicClimateNET project, the term and concept of ‘organic climate farming’ was coined to reflect the systematic integration of organic farming principles with climate farming practices in agriculture. The principles of organic farming promote a healthy planet, integrating ecological systems and natural cycles in its work. This approach promotes healthy soils, biodiversity, and deliberately provides several other co-benefits

in an overall integrated and resilient farming systems (Mueller et al., 2017). By incorporating the climate perspective into its principles, organic farming supports climate change mitigation and increases the overall climate resilience and adaptability of the farm in a changing climate while ensuring the provision of a range of system-relevant co-benefits associated with organic farming (OrganicClimateNet).

In practical terms, organic farmers often apply mitigation practices, because it makes sense within the overall farm-‘system’, e.g. to promote healthy soils as to increase yield and income. With higher soil organic carbon (SOC) stocks and different carbon holding capacities, organic soils do actively store carbon (Sanders et al. 2025; Sanders et al., 2023).), while mitigating the impacts of climate change more effectively (Brahma et al. 2024). At the same time organic farming supports yield stability under drought conditions (Lotter et al. 2003) contributing to economic viability as diverse mixed approaches to farming and price premiums help mitigating single crop yield and price volatility risks (Bacon, 2005). Diversification also relativises the often-cited lower performance of organic in yields (Ponisio, 2015), while one needs to be considerate of context more cautiously and the fact that organic farms are typically located on marginal lands (Seufert & Ramankutty, 2017).

Considerate of the specificities of organic, the OrganicClimateNET Project sets the focus on ‘enabling’ climate organic farming respectful of the intricate interlinkages between ecological, social and economic sustainability in organic farming as a systemic approach to agriculture. A key goal is to **support farms in developing holistic farm strategies from an integrated climate organic farming perspective** addressing climate change mitigation, adaptation as well as key ecological and social co-benefits as well as long-term economic viability. In this thinking not only a holistic, system approach to farming is key, but also policies and measures that ensure access to information, training and capacity building support (see Figure 1).

Figure 1. Key elements of organic climate farming.



To support the organic farms in this effort, the project focuses provides key insights for policy with practical knowledge supporting climate organic farming from such an integrated perspective on the following aspects:

- **Climate Mitigation and Adaptation:**
 - o climate-relevant **farming practices** for:
 - Mitigation
 - Adaptation
 - and Co-Benefits
 - o **Carbon Assessments:** Support farms in developing a carbon-assessment
 - relevant tools & methods for carbon assessment?
 - o Standard and Certification schemes
 - Including for company reporting obligations
- **Knowledge:** Knowledge Building & Transfer
 - o Building of advisory/know-how and Peer-2Peer-Learning-Network on
 - o organic climate farming strategy and practice
- **Economic viability:** identifying and understanding funding-mechanisms (market, public, indirect) that support the integration of climate practices at farm level

These three pillars are also relevant aspects to consider in the assessment of the EU-policies from an integrated organic climate farm perspective that spans mitigation, adaptation and co-benefits while considering the economic viability and longevity of farming practices through capacity building.

Objective of this deliverable

In this policy assessment, the goal is to gain a better understanding of the specific policy mix in place or currently established or planned that affects (or will affect) organic farmers across all dimensions. While doing so, it seeks to shed a light on the question which policies support and which hinder farmers in implementing a holistic climate organic farming perspective. As a first step, relevant EU policies related to climate farming are mapped at a general level. Subsequently, specific policies are prioritized for further analysis based on their potential to support the integration of climate farming with organic practices:

- Organic climate farming practices to mitigate and adapt to climate change and achieve other co-benefits
- MRV and carbon assessment
- Standard setting and reporting
- Knowledge exchange and capacity-building
- Organic climate economic viability

Along those dimensions the subject-area specific policy-mix is analysed as to whether and how it supports or hinders integrating the climate perspectives in organic. In conclusion, the report elaborates on necessary steps at EU and at national level, toward an integrated organic climate farming perspective in European agriculture.

2 Key concepts & methods

Multi-level, cross-sectoral policy analysis

The organisation of European agricultural policy and regulatory authority across scales and sectors makes the EU a prime example of multilevel governance (MLG). MLG conceptualises the interplay between different levels of policy ranging from the local to the national and EU (or supranational) levels, and vice versa. A core idea is that in a multi-jurisdictional setup (Hooghe & Marks, 2002), -is not just top-down regulation from sender to recipient but is dispersed across and shared across different political strata. The structure of the EU, comprising the European Parliament and Council, the European Commission and bodies such as the European Committee of the Regions, reflects both the concept of EU-wide policies and the principle of subsidiarity, which grants significant autonomy to national and sub-national processes in shaping policies. Beyond public policies of member states, the concept of governance also explicitly includes non-state actors and non-regulatory ways of governing and policymaking (Fairbrass & Jordan, 2004). Reflecting this idea, the analysis will focus on formal EU-level policies and softer forms of governance, explicitly including types of policies that go beyond 'hard' regulatory acts and involve 'soft' approaches to governance, such as voluntary commitments, communications or even sectoral self- or co-governance. At this latter end of the spectrum, we also find voluntary and market-based 'performative' measures and even publicly supported research and innovation efforts in agriculture that develop, test and promote climate-smart practices in the making, like the OrganicClimateNET project.

With the assessment at hand, WP10 (the WP supporting policy design) identifies and maps out the most important policy targets and policy measures of more or less direct relevance to climate farming more generally, and its relevance to organic agriculture more specifically. It is based on a *light touch review* of existing policies, including reflections on practical implementation at local, regional and national levels through partner and stakeholder engagement. The review includes legal and regulatory frameworks, enabling and constraining policies, programmes at EU level in support of more sustainable (esp. organic) and climate-friendly agriculture, in various ways including indirectly through information, research and development or via partnerships with private actors. For illustrating how policies are implemented at Member State level, the analysis draws on national case studies.

Types of relevant policies in OrganicClimateNET

The EU has various policies and legal instruments with different levels of hierarchy. One key distinction is between primary and secondary legislation.

Primary legislation establishes treaties between EU-member states and empowers the EU and its institutions with the core competency of policymaking, including in the areas of agriculture and environmental policies.

Secondary legislation rests in these treaties and consists of binding or non-binding legal acts. The EU knows 5 different types of policy measures at "secondary legal order" (European Commission, n.d.).

The different types are briefly described below.

- **Directives** as legally binding instruments establish common goals, but allow for significant national discretion in decision making, often reflected in varying national targets and measures. They are expected to be 'transposed' into national law within a certain timeline.
- **Regulations** (binding, with no national transposition) are directly applicable laws that Member States have to follow without the need for further addition or transposition into national law.

- A **decision** is a binding legislative or (more commonly) non-legislative act that deviates from legislative procedures involving Parliament and/or the European Council. By contrast, it is adopted by the EC following delegation or to implement a legislative act.
- **Recommendation**: EU institutions can express their views and suggest actions but cannot impose any legal obligation on the addressees. Recommendations have no binding force.
- **Opinions**: This instrument allows EU institutions to make a statement without imposing a legal obligation on the subject. An opinion has no binding force.

Beyond legislation the EU policymaking is pursued based on Strategic Documents (Strategies, Communications, White / Green Papers, Action Plans). Communications are non-binding, but the European Commission uses them to express policy ideas or to announce actions. Throughout time, the EU developed several shared frameworks and strategies, like those known as the “Green Deal”, “Farm to Fork” or “Biodiversity Strategy”. These are **non-binding** but set the direction and baseline for definition of secondary legislation. They provide a shared narrative framework and thus orientation for the respective policies of the member states along broader objectives or, possibly with concrete, numerical targets for future policies. Frameworks are the key reference for more concrete and, more or less, binding policy measures at secondary level that countries will put in place as to achieve these objectives. They are typically accompanied with policy guidelines on how to put the policies in place exactly.

Scope of assessment

The scope of the policies assessment tries to focus on **policies that more or less directly affect organic farmers in their decision making on the farm as relevant for climate action**. In this respect, three dimensions are relevant for the analysis in line with the mentioned understanding of multi-level and multi-sectoral governance: 1) policy relations; 2) policy impact; 3) context.

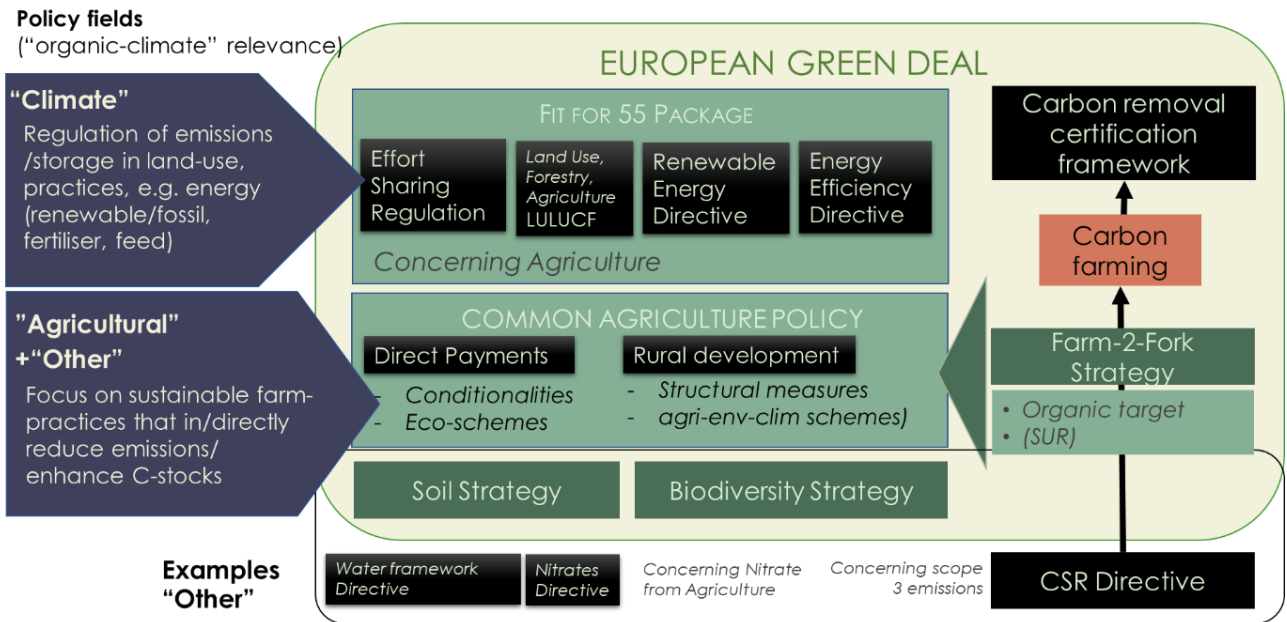
The first refers to the idea of how policies relate to each other within a broader institutional or policy environment across sectors (beyond climate policies) and with that synergies and trade of in support of organic climate farming, whereas the second provides an idea of the different approaches and ways in which policies may exert an impact on farm-level practice more or less effectively. Finally, the consideration of national conditions and experience pays heed to context dependency of policy implementation.

2.2.1 EU policy map

In the first respect, it is not only important to pay attention to the multi-level nature of policies, but also the fact that relevant policies may not always be explicitly climate and/ or agriculture related, but possibly rooted in other sectoral domains, e.g. when regulating value chains or food industry. Climate specific policies may most obviously be associated with the reduction of GHG emissions or removals in agriculture, including through reduced energy use at farm level or the emissions or removal trading schemes. This climate relevance may in fact also be the case for policies in other sectors and corresponding policy fields, e.g., agriculture- or other water- or nature conservation-specific policies that may, indirectly, lever climate action on farms. For instance, objectives could be to reduce nitrate or heads of animal for water protection reasons or the increase of wood perennials (hedgerows, habitat trees) for nature conservation purposes. A climate objective of reduced fossil fertilizer use, or carbon removal, may then be fulfilled effectively through the ‘back door’. Agricultural or biodiversity related policies targeted at supporting rural landscapes may however not always be supporting climate farming practices or automatically induce emission reductions or removals as co-benefits. Analytically, attention may be given to the interlinkages or alignment between different sectoral policies, e.g. by being part of broader policy frameworks or visions, like the European Green Deal; but also to possible trade-offs between diametral objectives followed with climate-, agriculture-, water- or nature conservation-specific policies, respectively. Drawing exemplarily on policy examples, Figure 2 reflects this idea

of a dispersed map of relevant policies with interlinkages between different sectoral domains, frameworks and policy measures as followed in this OCNET policy assessment.

Figure 2. Map of policy examples and their interlinkages.

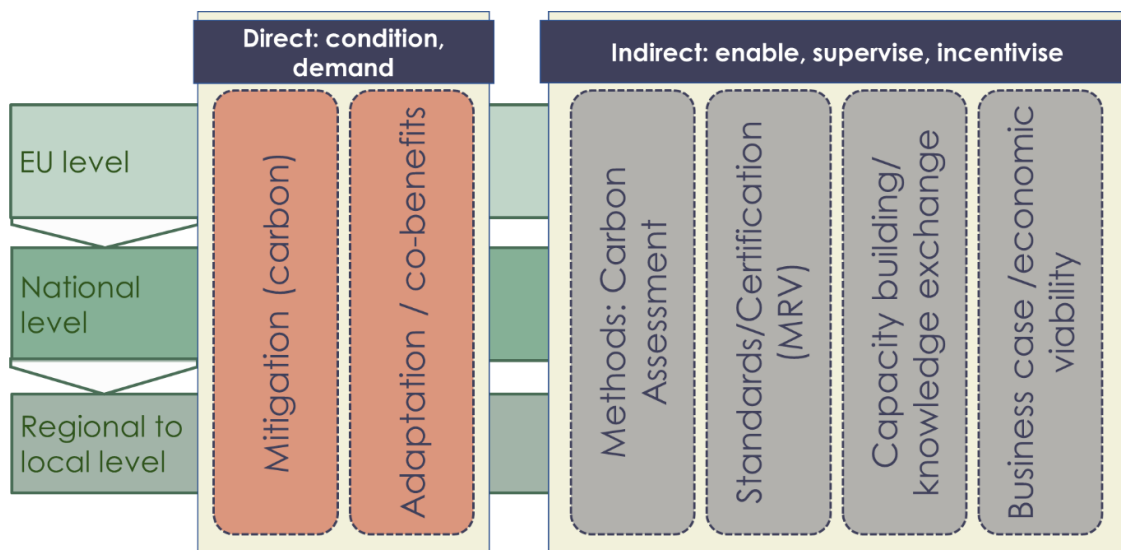


(own figure, OCNET/FiBL CH, using examples without claim of completeness)

2.2.2 Policy impact from a farming perspective

Evidently, the question of whether and how policies support or hinder integrating the climate perspectives in organic practice extends beyond mapping exercises. In this assessment we will elaborate on aspects of ‘policy impact’ by drawing in the OCNET project’s approach to ‘integrated organic climate farming’. In this rationale the focus is not only on practices for climate mitigation and carbon removal, but also on adaptation, climate resilience and other co-benefits with links to the integrated perspective. In addition, our policy assessment seeks to reflect that and how changes in practices may in fact be effectively triggered or hindered through different policy approaches and levers. For instance, methodological rules set in place for calculating, monitoring or reporting (e.g. as part of third-party obligations in value chains) may eventually be performative (or constraining) at farm-level. Likewise, policies may exert an effect by enabling or incentivising, such as through capacity-building and knowledge exchange or by ensuring that organic climate farming can be profitable or get access to market (even beyond the carbon), respectively. In light of the diverse possible more or less direct levers, the policy analysis will consider a range of policy measures along these different logics as displayed in Figure 3 (across multi-level and through different policy levers)

Figure 3. Rationales behind policies targeting organic climate farming (in/directly).



2.2.3 Contextualisation in national implementation realities

Considerate of national variation and authority in implementation that may lead to quite distinct implementation realities of the shared EU policy frameworks, the analysis thought to reflect certain national peculiarities without following necessarily the intention to provide a comprehensive comparative approach or cross-country comparison.

Material and data

Considering the scope of analysis, data stems from a diverse range of sources as to be able to ‘triangulate’ and thus consolidate claims from different material:

1. Legal content analysis
2. Chat GPT search
3. Policy Mapping
4. National partners Workshop

In the first step the team of policy analysts from different partner organisation (esp. FiBL Europe, FiBL CH, IFOAM) identified and analysed a set of relevant climate, agriculture and organic EU policies (see also **Error! Reference source not found.**, first column). A second step was to verify this preliminary list employing AI search technology (ChatGPT, see Table A in the Annex for the full search thread) for a time efficient and more exhaustive analysis of web sources and possibly broaden the sample in step 1. Building on the identified linkages in the Chat GPT and legal analysis, a map of policies was developed to reflect not only the features, but also these interlinkages. Parallel work in WP4 task 4.2 on MRV and rewarding schemes informed this analytical step providing nuance particularly in relation to aspects related to economic feasibility and assessment. Finally, stakeholders were invited to reflect on and prioritise the most relevant policies in this policy landscape for the organic climate farming practice. The major analytical approaches, key categories for content analysis, mapping as well as ground prioritisation by practice is further specified in subsections 2.3.1-3.

2.3.1 Content analysis

For the qualitative approach to the applied content analysis of policies and secondary literature (assessing or evaluating policies) a set analytical dimensions and corresponding research questions was developed to guide the scoping and inventorying at EU and national level. The last four analytical categories concern dimensions such as goals, relevance, effectiveness and challenges and these build the analytical basis for the assessment

conducted with the study. Beyond these key analytical dimensions for assessing how well integrated policies address climate farming and organic this content analysis also entailed a number of descriptive categories (No. 1-8) such as name, policy type, level, or funding program etc.) that allow contextualising the policy assessment including in the historical development or inter-institutional linkages in line with the understanding of policies working in ‘mixes’.

Table 2. Dimensions of analysis for EU and national policies.

Category		Description/examples
1	Name	Name of policy analysed
2	Policy type	E.g., regulatory, framework
3	Level of policy implementation	EU, national, regional, local
4	Sectors	E.g., energy, agriculture, environment
5	Legal frameworks associated	Legal frameworks associated
6	Developments	Historical context of the policy
7	Funding programs	Funding programs
8	Agents	Responsible for implementing the policy
9	Policy goals/objectives/targets	Policy goals, objectives, targets
10	OCNET relevant measures	Measures relevant to the project
11	Effects/effectiveness	Effects and effectiveness
12	Challenges	Challenges faced in implementing the policy

To complement this list of identified policies that was elaborated based on ‘best knowledge’ from core organisations, we retrieved an additional list of relevant policies from ChatGPT as to verify the internal expert opinion and identify possible gaps, correspondingly, e.g. of policies only indirectly related to our core subject of agriculture. The major thread was “What EU policies are particularly relevant for the nexus of organic farming, agriculture, and climate action?” (for detailed thread with sub-questions see Annex 1). The Chat GPT also addresses aspects of impact elaborating on key barriers for climate mitigation and adaptation through these policies. The Chat GPT complementary inquiry focused here only on the categories 1 (name) and 9 to 12 (see **Error! Reference source not found.**, assessment criteria, highlighted in grey).

2.3.2 Policy mapping

Building on the descriptive information obtained in steps 1-2, in particular on the linkages specified, a mapping was conducted as a *third step* that was to reflect the varied features of the different policies and wherever possible already explore their mutually ‘constitutive’ role for governing organic climate farming. To understand better how the identified EU policies are linked and influence each other, the map proved to be a particularly authoritative analytical tool for sense making across the dimensions 1-5. We first asked ChatGPT how the identified EU policies are linked (for the exact procedure see Annex 1). In addition, we also consulted the respective [legal documents](#) and [websites](#) of the European Commission and had a look at the legal texts also to link them correctly. Based on both ‘inputs’ (internal/ChatGPT review) we started to map the policies. In fact, when feeding the list of policies from the internal and ChatGPT based search into the map as a ‘nuanced’ policy landscape additional related policies were identified included. **Error! Reference source not found.** lists all relevant policies reflective of overlaps (grey) and the step in which they were identified (columns).

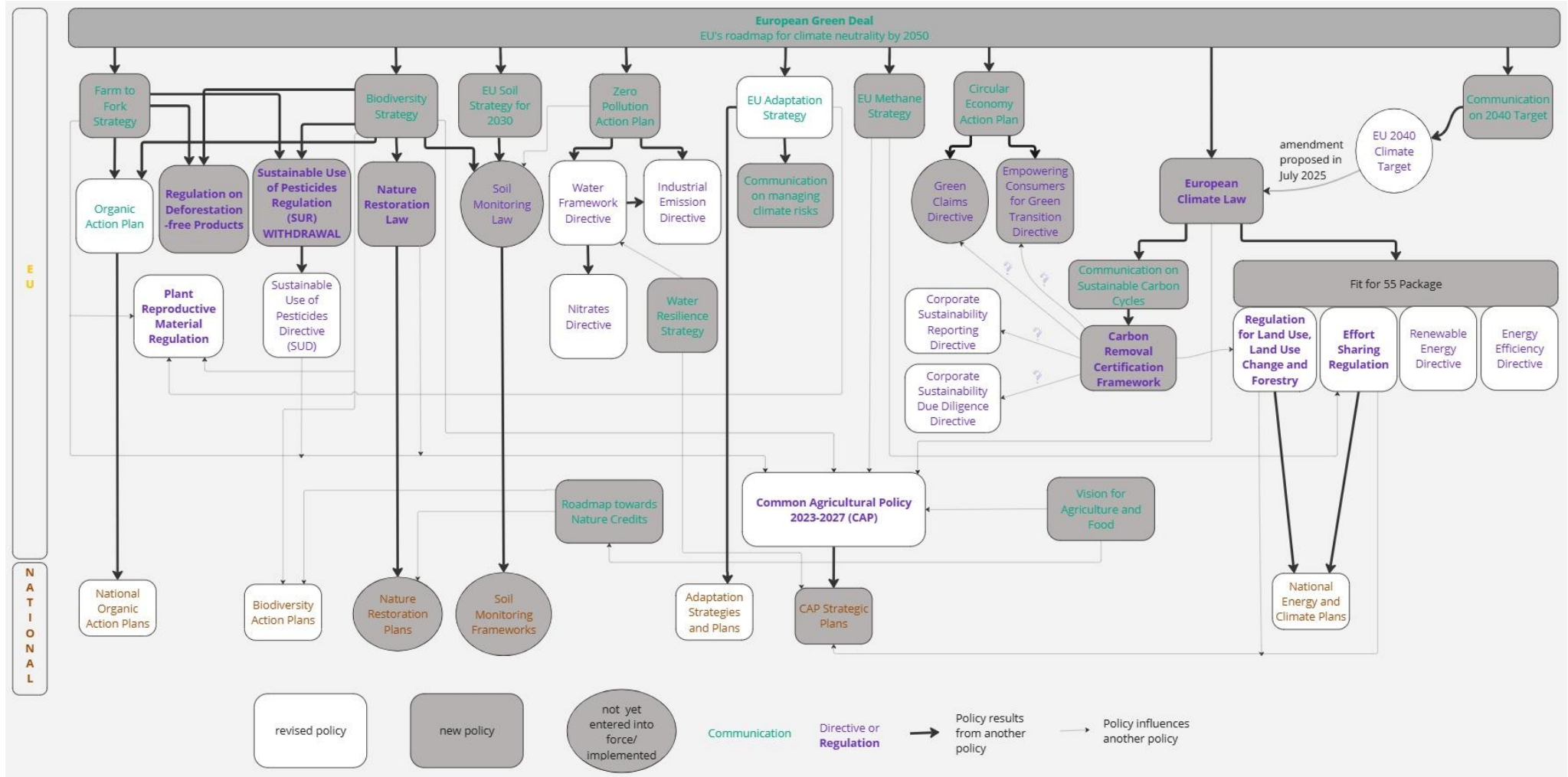
Table 3. List of relevant EU policies at organic-climate-agricultural nexus.

identified in project team	identified by Chat GPT	added during mapping
Land Use, Land Use Change and Forestry Regulation (LULUCF)	Land Use, Land Use Change and Forestry Regulation (LULUCF)	EU Methane Strategy
Effort Sharing Regulation	Effort Sharing Regulation	Circular Economy Action Plan
Common Agricultural Policy 2023 – 2027	Common Agricultural Policy 2023 – 2027	Regulation on Deforestation-free Products
Biodiversity Strategy	Biodiversity Strategy	Corporate Sustainability Due Diligence Directive
European Climate Law	European Green Deal	EU 2040 Climate Target
Fit for 55 package	Farm to Fork Strategy (F2F)	Energy Efficiency Directive
Nature Restoration Law	EU Adaptation Strategy	EU Soil Strategy for 2030
Industrial Emission Directive	Renewable Energy Directive (RED II)	Water Resilience Strategy
Communication on Sustainable Carbon Cycles	Soil Monitoring Law (Drafted)	Vision for Agriculture and Food
Carbon Removal Certification Framework	Zero Pollution Action Plan	
Soil Monitoring Law		
Communication on 2040 target		
Communication on managing climate risks		
Green Claims Directive		
Empowering consumers for green transition Directive		
Corporate Sustainability Reporting Directive		
EU Plant Reproductive Material Regulation		
Biodiversity Strategy		
Water Framework Directive		
Nitrates Directive		
Sustainable Use of Pesticides Directive		

With this triangulated approach to review, we obtained a more complete overall picture of potentially relevant policies and their linkages as mapped in **Error! Reference source not found.**. The map provides a useful tool for the further stakeholder engagement in step 4 (see next section for details of workshop and analytical procedure).

In the map shown in **Error! Reference source not found.**, policies that have entered into force are enclosed in rectangles. Policies that have not yet entered into force or have not been implemented are enclosed in circles (as of July 2025). If a policy has been revised, the background of the surrounding shape (rectangle or circle) is white, newly developed policies are shown with a grey background. Communications are shown in green, while Regulations and Directives are shown in violet. Directives are additionally highlighted in bold. Interlinkages between policies are represented by arrows; a light arrow indicates that the policies influence each other while a bold arrow indicates that the linked policy is the direct result from another policy.

Figure 4. Mapping of relevant climate, agriculture and organic policies.



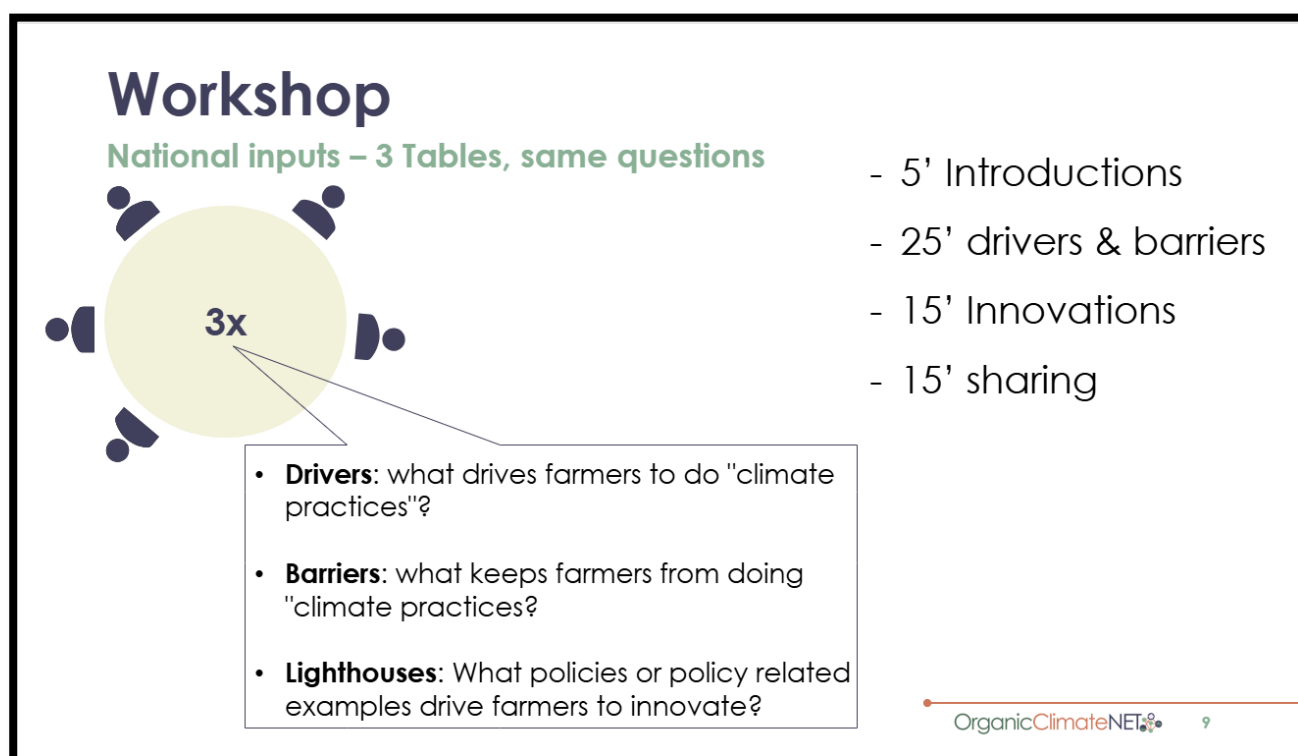
2.3.3 Stakeholder process

The map provides an overview over all policies that are in the broadest sense more or less linked to the subject of organic farming and/or climate. It does not properly reflect though the actual implementation realities in countries. Apart from grasping the variance in implementation among member states on a principle note it was key to understand the impact of specific policies and measures in support of organic /climate farming practice and to explore possible barriers but also avenues for fostering climate practices in (organic) agriculture. There were two stakeholder processes conducted in the project to allow for implementation related reflections.

Policy workshop, April 2025

A simple World Café format was applied during the General Assembly meeting in Lyon on 3rd of April 2025 (see figure) to discuss with the stakeholders present from 10 different countries the policies that have highest relevance through three guiding questions for stakeholder reflection

Figure 5: Workshop run down with national practice partners, 3 April.



While the first questions are meant to provide context and to also be able to identify scope for interventions of (future) policies, based on experience with past/existing schemes, the last question was key to identify which policies from the list are the most relevant in the practical implementation at national level. They were also encouraged to reflect on differences among countries but also trade-offs or conflicts between policies or other dynamics - where existent to ensure the broader picture of policy mixes is reflected.

In preparation of the workshop session, national coordinators (national farming associations) were provided with a guidance question and instructions:

What are drivers and barriers for farmers in your country to implement climate practices? Can you link these to specific policies?

We asked partners to reflect on this question and bring practical examples from their countries to the discussions, drawing particularly on own practical experience as hub coaches or farmers in the network. The preparation via email also covered some stimulating questions for preparation:

- Which national policies had impact in encouraging farmers to adopt new practices (whether climate-related or otherwise)?
- What policies related to climate or farming are currently being discussed or have recently been implemented at national level?
- Do you have a concrete example of an organic farmer adopting climate related measures or becoming interested in the topic. What exactly drove the adoption: policies, markets or any other relevant force?
- Did any political trend or development (at EU or national level) “stimulate” you to join the project? If so, which ones?

The key outputs of the discussions were collected on moderation cards and posters and were transcribed as to feed into the reflections in this report in terms of key barriers and drivers in implementation realities.

Rewarding schemes workshop, 26 May 2025

While related to the analytical work in work package 4, not only the analysis of MRV and rewarding scheme mechanisms (task 4.2) as well as data collection protocol (task 4.3) conducted proved relevant to this report, but in particular the discussions with different practice partners during the first reporting period. The considerations and reflections during an online engagement at the end of May delivered valuable insights of high relevance to the assessment of the policy landscape especially in relation to different types of rewarding schemes and approaches to assessing carbon. It allowed to dive deeper into existing rewarding schemes, that typically form part of existing support measures (like CAP) as well as MRV arrangements as to reflect on their role for organic carbon farming. In the course of the work also possible future measures were discussed regarding their hypothetical working of policy schemes still under discussion, such as nature credits (for further details see OCNET deliverables 4.2 and 4.3).

2.3.4 Streamlining project planning for policy advice

Complementary to the assessment in Deliverable 10.1 and the accompanying policy inventory, a timeline tool has been developed. This tool focuses on active policy processes—defined as legislative or regulatory initiatives that are either still under negotiation or recently adopted and in need of immediate post-adoption steps by Member States. These actions are particularly relevant for organic farmers, especially in the context of climate-friendly farming practices. The timeline spans 2020 to 2030 and is structured by calendar quarters. It captures:

- ➔ Key milestones and developments at the EU level, including the European Commission, the Council, and the European Parliament;
- ➔ Significant national-level activities undertaken by individual Member States in relation to the implementation of EU frameworks.

Intended solely for internal use within the project consortium the primary purpose of the tool is to help align the project's planned policy engagement activities—such as policy briefs, stakeholder events, or consultations—with the evolving EU policy calendar. This ensures timely and strategic contributions to ongoing legislative and implementation processes. Beyond the role for planning policy advice the tool also supports the work in this deliverable by adding a temporal dimension to the reflections. A screenshot of the timeline tool (*in progress*) is attached to this report (Annex 2: EU policy timeline tool).

3 Results

General features of relevant policies

European Green Deal

At the heart of the EU's climate action is the **European Green Deal** ([COM\(2019\) 640 final](#)) (presented in December 2019) aiming for climate neutrality by 2050. To reach this target many policy initiatives followed which are relevant for organic climate farming.

European Climate Law and Circular Economy Action Plan

The climate neutrality target by 2050 set in the Green Deal is legally anchored through the **European Climate Law** ([Regulation \(EU\) 2021/1119](#)) (adopted in June 2021), which not only commits the EU to reaching net-zero greenhouse gas emissions by mid-century but also sets the intermediate target of cutting net emissions by at least 55% by 2030 compared to 1990 levels.

To meet these goals, the EU introduced the **Fit for 55 package** — a set of legislative proposals designed to align EU legislation with the 2030 target. Within this package, the Regulation for Land Use, Land Use Change and Forestry (LULUCF), the Effort Sharing Regulation (ESR), the Renewable Energy Directive and the Energy Efficiency Directive are the most relevant for the agricultural sector which were revised under the European Green Deal.

- The **Land Use, Land Use Change and Forestry Regulation** (LULUCF Regulation) ([Regulation \(EU\) 2023/839](#)) includes CO₂ emissions and removals from cropland, grassland, and forests. It sets an EU target of storing an additional 310 million tonnes of CO₂ equivalent by 2030 and imposes binding net carbon removal targets on each Member State.
- The **Effort Sharing Regulation (ESR)** ([Regulation \(EU\) 2023/857](#)) targets the sectors transport, buildings, small industry, waste and agricultural non- CO₂ emissions. It raises the ambition for these sectors to reduce the GHG emissions by at least 40% by 2030 (compared to 2005 levels) and sets reduction targets for the Member States.
- The **Renewable Energy Directive** ([Directive \(EU\) 2023/2413](#)) sets a binding renewable energy target of at least 42,5% at EU level by 2030. This is also relevant for the agricultural sector, which not only consumes energy but can also produce renewable energy (e.g. Biogas).
- The **Energy Efficiency Directive** ([Directive \(EU\) 2023/1791](#)) raises the EU's ambition on energy efficiency and also includes the agricultural sector.

National Energy and Climate Plans (NECPs) outline how each Member State contributes towards binding EU energy and climate targets over a 10-year period. The NECPs for the period 2021-2030 were updated and submitted by the Member States by June 2023 to incorporate the targets of the Climate Law and the Fit for 55 package.

Moreover, the European Commission published a **Communication on Sustainable Carbon Cycles** ([COM\(2021\) 800 final](#)) in December 2021 and in December 2024 an agreement was reached on the **Carbon Removal Certification Framework (CRCF)** ([Regulation \(EU\) 2025/3012](#)). The regulation sets quality criteria and certification processes for carbon removals and it aims to create a consistent approach across the EU. Besides permanent carbon removals and carbon storage in products, it also includes carbon farming - bringing focus on soil carbon sequestration on agricultural land, rewetting of peatlands and agroforestry. The concrete methodologies are currently being developed and are expected to be published later this year. The CRCF will also contribute to the 2030 carbon removals target in the LULUCF sector.

Moreover, the CRCF might influence both the **Empowering Consumers to the Green Transition Directive** ([Directive \(EU\) 2024/825](#)) (March 2024) and the **Green Claims Directive** (in dialogue) concerning climate-related claims for agricultural products. Both directives aim to fight greenwashing and result from the **Circular Economy Action Plan** ([COM\(2020\) 98 final](#)), which set out initiatives to transition to a circular economy (March 2020). Additionally, the European Commission might link the **Corporate Sustainability Reporting Directive** ([Directive \(EU\) 2022/2464, version 2025](#)) (revised April 2025) and the **Corporate Sustainability Due Diligence Directive** ([Directive \(EU\) 2024/1760, version 2025](#)) (revised April 2025), which both aim to increase the corporate responsibility of large companies concerning social and environmental issues, with the CRCF for climate-related reporting obligations.

In February 2024, the European Commission published its **Communication on a 2040 Climate Target** ([COM\(2024\) 63 final](#)). It recommends reducing the EU's net GHG emission by 90% by 2040 relative to 1990. So far, only the 2030 target is legally binding. In July 2025, the Commission published a legislative proposal to include the 2040 target in the European Climate Law. The proposal is now under discussion in the European Parliament and Council and follow the ordinary legislative procedure for adoption.

Biodiversity Strategy, Farm to Fork Strategy and EU Soil Strategy for 2030

The **Biodiversity Strategy** ([COM\(2023\) 380 final](#)) (May 2020) outlines actions to protect nature and reverse the degradation of ecosystems. It plays a central role in climate mitigation and adaptation.

One element of the strategy is the **Nature Restoration Law** ([Regulation \(EU\) 2024/1991](#)) (August 2024) which sets binding targets to restore degraded ecosystems, including agricultural ecosystems. One of the targets is to restore soil organic carbon for agricultural soils and the rewetting of peatland. EU Member States are currently developing their **National Restoration Plans** which are expected to enter into force by mid-2026.

Another important element under the Biodiversity Strategy was the proposed **Sustainable Use of Pesticides Regulation** which aimed to reduce pesticide use by 50% by 2030. However, this proposal was withdrawn by the European Commission (May 2024) after it was rejected by the European Parliament and stalled in the Council. As a result, the earlier **Sustainable Use of Pesticides Directive** ([Directive 2009/128/EC, version 2019](#)) (October 2009) remains in force.

In addition, the proposed **Soil Monitoring Law** (provisional agreement reached in April 2025) is part of the implementation of the Biodiversity Strategy as well as the **EU Soil Strategy for 2030** ([COM\(2021\) 699 final](#)) (November 2021) which is a plan to protect and restore soil health across the EU. Additionally, it will contribute to the Zero Pollution Action Plan (see below). The Soil Monitoring Law will establish a framework for soil monitoring, later the EU Member States will develop their **National Soil Monitoring Frameworks**.

Moreover, the EU Biodiversity Strategy aligns with the Global Biodiversity Framework under the UN Convention on Biological Diversity (CBD). This includes the commitment to develop and update **National Biodiversity Action Plans** in line with international biodiversity targets.

In July 2025, the European Commission published a **Roadmap towards Nature Credits** ([COM\(2025\) 374 final](#)) outlining the development of common standards and certification systems for nature-positive actions. The initiative aims to incentivise private investment in nature protection and preservation, helping to close the biodiversity financial gap. Nature credits could maybe support reaching the national targets under the Nature Restoration Law or the CBD.

The **Farm to Fork Strategy** ([COM\(2020\) 381 final](#)) (May 2020) aims to make food systems fair, healthy and environmental-friendly. The Farm to Fork Strategy and the Biodiversity Strategy set both the target of at least 25% of the EU's agricultural land under organic farming by 2030. To support this goal, the European Commission launched the **Organic Action Plan** ([COM\(2021\) 141 final](#)) (May 2022). This plan outlines measures

to stimulate demand for organic products, reinforce the entire organic value chain and strengthen environmental sustainability. The EU Member States have developed their own **National Organic Action Plans**, which are tailored to the national context and contribute to achieving the EU-wide 2030 target.

An additional policy, contributing to both the Farm to Fork Strategy as well as of the Biodiversity Strategy is the **Regulation on Deforestation-free Products** ([Regulation \(EU\) 2023/1115, version 2024](#)) (June 2023). This regulation ensures that certain agricultural commodities or products placed on the EU market or exported from it do not contribute to deforestation or forest degradation globally. This aims to decrease GHG emissions and biodiversity loss.

The **Plant Reproductive Material Regulation** ([COM\(2023\) 414 final](#)) is currently under revision to align with the objectives of the Farm to Fork, Biodiversity and EU Adaptation Strategy. Plant reproductive material refers to any plant material (e.g. seeds, cuttings or roots) used for reproduction and propagation of plants. Seeds play a central role in achieving a more sustainable, productive and diversified agriculture in the EU.

EU Adaptation Strategy

The updated **EU Adaptation Strategy** ([COM\(2021\) 82 final](#)) (December 2019) outlines how the European Union aims to adapt to the unavoidable impacts of climate change and enhance climate resilience by 2050. Given that agricultural production is particularly vulnerable to extreme weather events, effective adaptation measures are essential. EU Member States developed their national Adaptation Strategies and Plans tailored to their specific context. The **Communication on managing climate risks** ([COM\(2024\) 91 final](#)) (March 2023) details how the EU can proactively address increasing climate-related risks and strengthen resilience. It responds to the European Climate Risk Assessment which is part of the EU Adaptation Strategy.

Zero Pollution Action Plan and Methane Strategy

The **Zero Pollution Action Plan** ([COM\(2021\) 400 final](#)) (May 2021) sets an overarching goal to reduce air, water and soil pollution no longer harmful to health and natural ecosystems.

Central to water protection efforts is the **Water Framework Directive** ([Directive 2000/60/EU](#)) (revised lists of pollutants under trialogue). It identifies 'priority substances', including pesticides, and aims reduce or eliminate their emissions in surface water. Climate change significantly influences the implementation of the Water Framework Directive, as climatic variables affect water availability and quality, underscoring the need to integrate climate considerations into water management strategies. The **Water Resilience Strategy** ([COM\(2025\) 280 final](#)) (June 2025) aiming at restoring and protecting the water cycle, building a water-smart economy and ensuring access to clean and affordable water. It also supports the effective implementation of existing EU water rules for freshwater, such as the Water Framework Directive. Closely linked to the Water Framework Directive is the **Nitrates Directive** ([91/676/EEC, version 2008](#)) (December 2008). It seeks to prevent water pollution from agricultural nitrates and promotes sustainable farming practices. The **Industrial Emission Directive** ([Directive 2010/75/EU, version 2024](#)) (revised August 2024) targets pollution from large industrial installations and intensive livestock farms (pig and poultry) in line with the Zero Pollution goals; notably, organic pig farming falls outside its regulatory scope.

The **Methane Strategy** ([COM\(2020\) 663 final](#)) (October 2020) outlines legislative and non-legislative actions to reduce methane emissions across the energy, agriculture and waste sectors.

Common Agricultural Policy and Vision for Agriculture and Food

The **Common Agricultural Policy (CAP)** ([Regulation \(EU\) 2021/2116, version 2024](#), [Regulation \(EU\) 2021/2115, version 2024](#)) is the agricultural policy of the EU that implements a system of agricultural subsidies. One of the objectives of the CAP 2023 – 2027 (January 2023) focusses on climate change action. Through CAP Strategic

Plans, the Member States can address their specific national needs and potentials, thereby contributing to the achievement of EU-wide climate targets.

In the **Vision for Agriculture and Food** ([COM\(2025\) 75 final](#)) until 2040 (February 2025), the European Commission sets out the strategic direction for the agri-food sector over the next 15 years. It also offers initial guidance on priorities for the upcoming CAP reform. The proposal for the CAP 2028-2034 ([COM\(2025\) 560](#)) was submitted in July 2025.

The **Strategic Dialogue** on the [future of EU agriculture](#) was launched in January 2024. It brought together 29 stakeholders from the European agri-food sectors, civil society, rural communities and academia. The members of the Strategic Dialogue developed a report with their vision and recommendations for the EU's farming and food systems which was published in September 2024.

Relevant policy mix for OrganicClimateNET

3.1.1 Mitigation, Adaptation and co-benefits

In OrganicClimateNET, a key rationale is to enable climate organic farming while respecting the intricate interlinkages between ecological, social and economic sustainability of farms following a system approach to agriculture. A key goal is to support farms in developing strategies from such integrated climate organic farming perspective. When looking at the *overall* existing policy landscape in the EU there are, at least on a principle note, key levers or mixes of policy that support such "*integrated* climate organic perspective". However, integrity often cannot be fully accomplished for reasons of sectoral and thematic compartmentalisation in implementation practice combined with the voluntary nature of many policy strategies and measures. By contrast, yet only at a general level of objectives and targets climate change mitigation, adaptation as well as other key environmental co-benefits are narratively interlinked as mutually constitutive aspects of the sustainable development of the sector.

Climate change mitigation

Concerning the specific policy objective of climate change mitigation in agriculture, the EU has no particular binding quantitative goal neither for the agricultural sector nor concerning organic in particular. While the EU has set ambitious legally binding climate targets across all sectors, it only recognized the importance of the land-use sector as part of the climate mitigation on a principle note. Whether or not climate change mitigation (and adaptation) targets are achievable in the sector depend among others on political ambition, and socio-economic and technical factors. After considerable reductions of emissions by 24% between 1990 and 2012, reductions are stagnating. From 2005 to 2021 GHG only 2.7% of emissions were reduced EU-wide. While some countries project to further decrease agricultural emissions with additional measures (Austria, Croatia, Denmark, Finland, Germany, Spain and Sweden), others already anticipate a reversal of emission reduction trends (European Environment Agency, 2023). As Agriculture depends on natural carbon cycles and therefore has more 'hard to abate' emissions than other sectors there is an important role for removals as a means for Member States to fulfil their obligations. This concerns particularly non-CO₂ emissions from enteric fermentation, N₂O from soils or manure management (European Commission, 2023a). Their level depends on farming practices, as well as on diets /demand while being subject to trade-offs with other social, economic and ecologic objectives of the Farm to Fork Strategy – like food security, support to local livelihoods or the role of cultural landscapes for biodiversity. Carbon farming activities have a considerable potential for co-benefits in climate change adaptation (e.g. increasing soil carbon & water holding capacity, shade through Agroforestry etc.) addressing climatic risks that may undermine the capacity to reduce emissions or store additional carbon.

At strategic level direct links are made narratively between climate change mitigation in agriculture and other environmental objectives in the EU's Farm-2-Fork Strategy. In the communication on the **Farm-to-Fork**

Strategy, for instance, the EC clearly states that it expects “An increased share of organic farming will contribute to more biodiversity and reduced greenhouse gas emissions.” Although not legally binding, the Farm to Fork strategy draws on key objectives from the Green Deal (the overarching framework towards **climate neutrality by 2050**) and Biodiversity (and correspondingly Soil) Strategy and sets partly even quantified objectives for the sector (cf. Farm to Fork strategy) with (more or less direct) relevance to both organic and climate farming, such as to increase:

- ➔ Agro-ecological approaches in primary production or
- ➔ Adoption of organic farming practices to 25% by 2030 (ratio of arable land)

Or to reduce:

- ➔ GHG emissions from agriculture by 50% compared to 2005 levels by 2030
- ➔ Chemical and hazardous pesticides by 50%
- ➔ (fossil) fertilizer use by 20%
- ➔ Nutrient losses by at least 50%
- ➔ Sales of antimicrobials by 50%. (Farm to Fork Strategy for 2030)

When including emissions related to production, transportation and processing of feed, between 81-86% of the GHG emissions from the agricultural sector (total ~11%) relate to the animal sector (Peyraud & MacLeod, 2020). In its Farm-to-Fork Strategy the European Commission also explores the possibilities for sustainable and innovative feed additives for more sustainable livestock farming, which are prohibited in organic, and to reduce carbon leakage through imports while emphasizing carbon farming activities on European farms.

In the context of a general narrative toward sustainable food systems that are in balance with nature and biodiversity, organic farming is explicitly referred to by the Commission in the **Farm to Fork Strategy** as “an environmentally friendly practice that needs to be further developed” to achieve the goal of 25% organic farmland by 2030.

Numerous measures with a certain level of ambition that support farmers to take up more environmentally for instance climate friendly are voluntary in nature. Considerable discretion may exist, though, among individual countries in the effectiveness even of voluntary schemes. Principally oriented at its framework directives and regulations, including the Renewable Energy Directive, Energy Efficiency Directive or Water Framework and Nitrates Directives, the European Union’s **Common Agricultural Policy (CAP)** is the most important instrument for implementing the various objectives in relation to climate change in the land use sector to reduce emissions and enhancing carbon sequestration, e.g. in soils or woody perennials. Some of the investment and innovation-oriented components also are with a focus on increasing the share of renewables or fostering energy efficiency. It provides a mix of financial incentives in its voluntary schemes under pillar 1 (eco-schemes) and 2 (agri-environmental-climate measures, AECM) conditioned partly by climate-sensitive environmental requirements (GAEC).

Overall, the CAP Plans hold the potential to help achieve the climate objectives in the land sector (mitigation potential 31 million tonnes of CO₂e per year, or 78%), mainly in carbon sequestration and reduction of emissions from soil based on three major farming practices: crop protection/diversification, expansion of cover crops and conversion to organic. In terms of protecting existing carbon sinks, more than half (54%) of the 28 million tonnes of CO₂e/year would rest in maintaining organic farming (European Commission, 2024).

In principle, the GAEC are mandatory for receiving CAP payments. However, in practical terms they are not highly ambitious as to significantly reduce GHG emissions or store carbon leaving some considerable areas blind (esp. in relation to animal husbandry/methane).

The GAEC standards are to:

- maintain a stable area of permanent grassland;
- protect wetlands and peatlands;
- maintain soil organic matter and soil structure through a ban of burning arable stubble;
- protect water from pollution through the establishment of buffer strips along water courses;
- prevent soil erosion through relevant practices;
- protect soil by defining rules for minimum soil cover;
- preserve the soil potential through crop rotation;
- maintain non-productive areas and landscape features, and ensure the retention of landscape features through, for example, a ban on cutting hedges and trees during the bird breeding and rearing season;
- protect environmentally-sensitive permanent grasslands in Natura 2000 sites.

The GAEC provide critical safeguards for maintaining or sequestering carbon by improved soil health and integrity or for avoiding or reducing nutrient runoff that indirectly reduce inputs and emissions. In practical terms, principles of organic agriculture go well beyond the GAEC, and the certification as organic is considered compliant with several of the GAEC. Narratively no direct links are made between climate change mitigation objectives and soil health measures though. In effect, GAEC compliance is linked with about 27% of the full mitigation potential of the sector (European Commission, 2024).

An even higher potential is linked to voluntary eco-schemes (ca. 38%) which are defined by each country individually. Member States differ as to how many eco-scheme measures are available to farmers (between 3 and 21) in line with the differences in environmental preferences and natural resource settings as well as policy priorities concerning animal welfare or climate (Runge et al., 2022). Overall biodiversity enhancement and non-productive land is a prominent topic, addressed through support for organic farming (Runge et al., 2022). Another focus is on greenhouse gas emission reduction esp. through interventions on agricultural soils, aimed at storing more carbon and decrease nitrous oxide and methane emissions, or on reducing the quantity of fertiliser or pesticides used including through precision technology application increasing agro-chemical efficiency. The Dutch and Irish eco-schemes for instance focus on reducing fertiliser use and enhancing soil health through precision farming techniques. Germany implemented eco-schemes that prioritize the reduction of greenhouse gas emissions from agriculture. (Runge et al., 2022).

Already before their 'tagging' as agri-environment-*climate* measures in 2013 (applicable for the 2014-20 programming), AEEM were expected to support a considerable amount of climate actions under the CAP's Rural Development Programme (pillar 2) and the corresponding EAFRD Funding. Climate mainstreaming (both mitigation and adaptation) was a core principle of funding und already in earlier programming periods - following the provisions in [Art 8 of its regulation](#). Despite the discretion in implementing their national multi-annual programmes, Member States were demanded to dedicate at least 30 % of EU rural development funding on certain measures related to land management and the fight against climate change, and at least 5 % on the (community led) LEADER approach. The share increased to 37% to be devoted to measures benefitting the environment and climate, animal welfare and LEADER during the transitional phase (2021-22). towards the CAP 23-27. Currently Member States are obliged to 35% ring-fencing for environmental and climate measures under EAFRD (pillar II), which most Member States have committed to in their submitted strategic plans (European Commission, 2022). Explicitly the climate and environmentally sensitive spending is not only earmarked for agri-environment-climate measures (AEEM), but equally considered organic farming payments, among others, as eligible. Organic farming is attributed a key role for achieving the objectives of the CAP environmental priorities and focus areas on the cross cutting themes of environment, climate change mitigation and adaptation, and innovation, stressing the role of conversion and maintenance payments (although not all Member States use pillar 2 for that, cf. Lampkin et al. 2024). A principle for pillar 2 funds is that compensation for organic farmers needs to 'equalise' forgone income. Support of organic is generally

addressed in all Member States either under pillar 1 (eco-schemes) or pillar 2 (AECM), or both (e.g. in Portugal, Estonia, France, Latvia, cf. Lampkin et al. 2024), often covering payments for conversion and maintenance. There are in principle also several climate change mitigation and adaptation related components either under pillar 1 (eco-schemes) or pillar 2 (AECM) measures that, in principle, would permit organic farmers to deliver additional environmental benefits beyond what is achievable from support to organic conversion and maintenance alone. However, the concerns about double funding often lead to a situation, where combinations of organic with other environmental support is explicitly excluded, with few exceptions (like the ‘agri-ecological practices for organic’ in Latvia or Austria’s biodiversity measures in the organic farming support, cf. Lampkin et al. 2024). In implementation practice CAP payments not always ensure that organic support payments are handled equally or exceed alternative support combinations for agro-ecological and climate measures or eco-schemes for conventional or other types of farms – possibly assuming higher premium prices beyond economic realities (Lampkin et al. 2024). In effect this may disincentivise organic farms from adopting additional practices for climate change mitigation or adaptation or co-benefits beyond what is the organic standard, where climate change is a limited concern when it comes to the choice of plant varieties with adaptation features for local soil and climate conditions (Art. 6, (organic) Regulation [2018/848](#)).

The genuinely voluntary nature of eco-schemes and AECMs often limits the practical ability to promote more integrated approaches in agriculture, not only within organic farming, but across the sector more broadly. CAP spending may not always unravel additional climate benefits and lead to climate action beyond status quo. The European Court of Auditors (2021) special report on the programming period 2014-20 found that of the 100 billion (26% of total CAP) spent ‘coined’ as climate action in the period 2014-2020 (45.5 billion pillar 1, 57.7 billion in pillar 2) only about two thirds (18%) were eventually on climate action more broadly, often primarily addressing biodiversity, water or air quality, or socio-economic needs, while only 3.2 % of pillar 2 funds for RD aimed at GHG emission reductions or carbon sequestration explicitly. A key limitation is that CAP is not addressing emissions from livestock, capping or reducing animals and that CAP market measures promote animal products. Most strikingly CAP does not help protect carbon stored in grassland because of ineffective greening and cross-compliance requirements (not banning land use change, reseeded or ploughing). Despite the support of several practices to reduce chemical fertiliser use, the programme could not reduce (chemical) fertiliser use (which increased by 5%). While CAP funding supported the increase of organically managed land from 5.9 to 8.5% in 2019, the Court of Auditors questions the role of organic regarding reduced fertiliser (because of lower land use efficiency ratio and possible leakage).

Against the backdrop that the uptake of carbon sequestration actions like agroforestry was also highly limited in the period 2014-20, the policy packages that have evolved around the possibility to address the climate issue on the basis of the polluter pays principle and along the value chain are of interest. Linked to the Directives on Corporate Sustainability Due Diligence (Directive 2024/1760) and Corporate Sustainability Reporting the Carbon Removal and Carbon Farming Regulation (EU/2024/3012) provides a voluntary framework for (streamlining) certifying carbon removals, carbon farming and carbon storage in products across Europe (for more details see: standards). Based on the EU-wide certification system farmers (and foresters) can get compensated for their action that leads to removals and emission reductions, which provides access to new business models while creating benefits for biodiversity ([Press release](#) on CRCF Regulation, 20Feb, 2024). In the future the scheme may also include greenhouse gas emission reductions from livestock activities.

Adaptation

In its Adaptation Strategy of 2021, the EU explores different ways of **building resilience** into agricultural practice on farms by:

- Promoting **climate risk assessments** and early warning systems.

- Supporting **nature-based solutions** (e.g., restoring wetlands, hedgerows) that reduce vulnerability.
- Improving **access to climate data** via platforms like **Climate-ADAPT**.
- Encouraging the **mainstreaming of adaptation** into other EU policies.

All Member States are required to develop their own national Adaptation Strategies and Action Plans in line with European Climate Law and the EU Strategy on adaptation to climate change. In contrast to developing countries, there are in fact no obligations for European and other industrial countries to submit National Adaptation Plans (NAP) under the United Nations Framework Convention on Climate Change (UNFCCC) to back adaptation efforts.

In essence, the EU has no stand-alone policy on adaptation beyond a non-binding strategy. Rather it is integrated into a variety of policy frameworks (most prominently the Climate Law, Biodiversity Strategy, Farm to Fork Strategy or Nature Restoration Law, see also section on co-benefits) and specific political measures, particularly under the CAP. Most importantly, the EU requires Member States to specify climate adaptation goals in their Strategic Plans, or National Energy and Climate Plans. This may be seen broadly in line with the cross-cutting nature and intimate interlinkages with aspects of biodiversity protection or climate mitigation. However, intermingled into a broad set of provisions and frameworks the subject may also not receive the attention deserved in terms of the urgency and importance for the future of agriculture.

At country level numerous CAP Action plans or Organic Action Plans (e.g. Germany, France, Denmark, Netherlands, Portugal, Sweden, Austria) highlight the role of promoting organic as a strategy for achieving climate adaptation targets or – more generally spoken – resilience against climate stress, e.g. regarding soil and water quality aspects or promoting better organic adapted plant varieties.

Accordingly, CAP measures are core in implementing the objectives in farming practice, by incentivising practices that enhance climate resilience. Indirectly the GAEC principles focused on soil protection (crop rotation, soil cover) and sustainable water management (wetland, peatland protection) required for receiving full CAP payments point into this direction. Most of the eco-schemes (Pillar I: e.g. supporting crop rotation, cover crops, or agroforestry) or Agri-environment-climate measures (AECMs, pillar II) national contracts for sustainable land management or investment support (irrigation efficiency, resilient crop systems, and infrastructure) are oriented at building resilience into the sector. While they lack mandatory quality, they are also not exclusively for organic farmers.

Eventually beyond some basic level requirements for CAP funding there exists no obligation for farmers to adapt to climate change like opting for drought-resistant or local variety or to save water through respective technologies. In fact, as a highly context specific and complex affair such one size fit all regulation may be limited in their governability why more generic incentives-based systems adjusted in national and regional contexts seem principally like a suited governance model. The subject receives heightened attention more recently in the R&I and AKIS agenda (see sub-sequent chapter on AKIS)

(Biodiversity) Co-benefits

Considering the principle mutual interlinkages and cross-references of the various frameworks under the European Green Deal, there are a considerable number of strategies in place that inform policies like the CAP or Climate Farming in line with an integrated thinking to climate farming.

While **Biodiversity Strategy** is strongly oriented at the **Global Biodiversity Framework** under the **UN Convention on Biological Diversity (CBD)**, and requests member states to develop and update **National Biodiversity Action Plans** in line with international biodiversity targets, it forms also an integral part of the European Green Deal more generally, including to the **Farm to Fork Strategy** (May 2020) which aims to make food systems fair, healthy and environmental-friendly. The Farm to Fork Strategy shares the target of at least 25% of the EU's

agricultural land under organic farming by 2030 with its sister Biodiversity Strategy highlighting the intricate role seen in addressing key biodiversity targets through the boosting of organic practices more generally. The **Organic Action Plan** (May 2022) outlines the concrete measures to stimulate demand for organic products, reinforce the entire organic value chain and strengthen environmental sustainability. EU Member States are demanded to develop own **National Organic Action Plans**, that are tailored to national specificities and contribute to achieving the EU-wide 2030 target.

In the strategic documents and the [EU Organic Action Plan](#), organic is considered as relevant farming system for positive impact on climate farming, and even more so for a more sustainable way of farming. Organic farming is seen to contribute to four out of nine of the 2023-2027 CAP objectives: protecting the environment, contributing to the preservation of landscapes and biodiversity, generating a viable farm income, and responding to societal demands on food health, sustainable food and animal welfare (European Commission, 2023b) that stretch well beyond biodiversity co-benefits alone.

Beyond these more guiding documents and targets, there are some legally authoritative laws and regulations in place, most prominently the **Nature Restoration Law** (2024). It sets binding targets to restore degraded ecosystems explicitly including agricultural ecosystems. The overall narrative highlights the climate related implications of potential ecologically functional and integral systems, i.e. to capture and store carbon (in soils) and to prevent and reduce the impact of climate change bringing together both mitigation and adaptation. The regulation explicitly highlights organic farming as one of the approaches available to implement extensive agriculture vital for maintaining species and habitats. Only by 2026, however, EU Member States will submit their National Restoration Plans (2 years after enforcement) specifying how they will deliver on their restoration targets. Progress towards these targets will be monitored and reported on including through regular technical reports of the EEA ([European Commission](#)). It is still too early to judge the exact policy implications of the new framework regulation. However, Member States are likely to use existing architecture such as CAP for implementation. Additional incentives for strengthening biodiversity action could come from a system of nature credits. Just recently (July 2025) the European Commission has released its [roadmap](#) towards nature credits with the aim to incentivise (more) private investments into nature protection actions coherent with EU legislation (like Nature Restoration Regulation and the Carbon Removals Certification Framework). It is presented as an instrument for rewarding biodiversity positive action. In a study on the climate biodiversity nexus the European Commission stresses the intimate interlinkages of climate change and biodiversity and the importance of their mutual consideration in certification, acknowledging the possibility of integration in a future carbon farming scheme. In this context it may be critical that the CRCF further specifies biodiversity-linked or even biodiversity-positive carbon credits in future amendments. In fact, there is experience in Voluntary Carbon Market (VCM) to draw from in terms of creating demand for and methodologies for biodiversity standards (e.g. CCBS, Plan Vivo). It is to be seen in how far the future regulation will directly draw and rely on existing certification, including for organic, as expressed in its Communication from 7 July 2025 as to reduce administrative burden for farmers and as part of an integrated broader framework to foster transformation. Thus far the CRCF refers to biodiversity mostly in terms of safeguards and a notion of “doing no harm” while refraining from explicating the methodological requirements behind the objective that carbon farming should deliver on co-benefits.

Noteworthy, while EU Member States are developing their **National Restoration Plans** they remain ‘stuck’ with an outdated **Sustainable Use of Pesticides Directive** (from 2009). Here, it remains to be seen in how far the proposed **Soil Monitoring Law** (provisional agreement reached in April 2025) may serve broader objectives of the Biodiversity Strategy to promote healthy soils or if it remains limited to methodological aspects of soil sampling and monitoring.

Input of National Coordinators of OrganicClimateNET

When discussing the mix of policies for climate change mitigation, adaptation and in support of biodiversity co-benefits, there was a shared sense of welcoming the idea of having additional sources of income to make farming operations more sustainable. CAP funding was seen to not work towards more sustainable practices. Carbon Farming may eventually even serve as a key vehicle for more farmers converting to organic. However, the partners in the project shared the impression that concerning CRCF and the carbon farming framework more general (whatever future rewarding scheme will be in place) organic operators end up in a situation where ‘first movers’ and pioneers are facing financial disadvantages compared to farmers with low reference (or high pollution) level because of the principle of additionality.

In fact, also ethical considerations arose around a “bitter taste” of greenwashing when companies offset their pollution in places that are critical for producing food or conserving biodiversity (with possible trade-offs) while incentives focus mainly on one aspect of a holistic system: carbon. It is this integrity as a holistic system that appeared missing in the existing policy framework and corresponding incentive structures. Eventually some representatives raised the general question whether measure/practice-based systems like under CAP may serve the objective of emission reductions better. Farmers also orient their production at what consumers want, which provides another market-based lever for policy beyond thinking just about carbon to be traded. Another concrete concern related to the issue of permanence and the insecurity (and related risks) if carbon in soils is lost due to weather extremes beyond own control (more detail in more specific chapter on carbon assessments and certification).

The ongoing changes in recent reporting requirements for companies in the sector, such as the dilution of regulations on deforestation-free supply chains, combined with uncertainty about future incentive mechanisms, have created significant legal insecurity for current practitioners, resulting in a strong reluctance to proceed further. There was an impression that policy wants and needs proof of concept from practice while ignoring that risks of first moving (including by failing) is too much to ask for (considering the financial risks for pioneers). Hesitation to move to not destroy additionality

Even higher is the insecurity about the future “nature credit”. The elaborations on AKIS as well as adaptation and co-benefits give an impression for why farmers are still motivated and engaged in joint learning on organic carbon farming in the OCNET-network.

Adaptation matters for farmers. In comparison to the climate mitigation issue as a general subject of concern of whole societies, the changing climate is a risk to their own operations and business. The National Coordinators highlighted that and how extreme weather events, such as droughts or heavy rainfall, have become more frequent due to climate change and are heavily affecting farmers and their production. These challenges, however, are in fact also prompting (and in and by themselves) motivating farmers to change their practices in order to adapt to new climate conditions. As a result, climate change adaptation can serve as a valuable entry point for encouraging the adoption of climate farming practices. What is required here however is finance (for investments) and knowledge exchange (including between different countries and climate zones) to learn what works for organic farming in a future of a changing climate.

3.1.2 Carbon Assessments

The CRCF ([Regulation \(EU\) 2025/3012](#)) aims to set a voluntary framework for quality criteria for carbon removals and to establish a certification process. Carbon removal activities will have to meet Q.U.A.L.I.T.Y criteria in order to be certified:

- **QU.antification:** The activity must result in a measurable net carbon removal benefit or soil emission reduction.

- **Additionality:** The action must go beyond market practices and legal requirements, ideally based on a standardised baseline.
- **Long-term storage:** Carbon must be stored for a meaningful period of time – at least 5 years for carbon farming.
- **Sustainability:** The activity must do no harm to the environment or even benefit other sustainability objectives; a carbon farming activity should result in co-benefits for biodiversity.

An expert group is currently supporting the development of concrete methodologies for the Q.U.A.L.I.T.Y criteria which will be implemented via delegated acts. Starting in 2026, the European Commission is planning to begin recognising carbon crediting schemes that comply with the CRCF standards.

The Q.U.A.L.I.T.Y criterium 'Additionality', requires that climate actions go beyond common practice. Ideally, this is assessed using a baseline that reflects “the standard performance of comparable practices and processes in similar social, economic, environmental, regulatory and technological circumstances and take into account the geographical context, including local pedoclimatic and regulatory conditions.” (§14).

However, the current methodologies, which are under development by an expert group, do not yet foresee a standardised baseline. At the moment, only methodologies for an activity-specific baseline, set at the start of the carbon removal project, are included in the methodologies of the CRCF. However, this approach risks disadvantaging early adopters, such as organic farmers, who may already have high levels of soil organic carbon due to longstanding practices. Since soil carbon sequestration tends to reach a saturation point, these farmers may demonstrate few or no additional gains, despite maintaining high carbon levels. Consequently, their past efforts may go unrecognised and uncompensated. In contrary, a standardised baseline is intended to recognise the past efforts of first movers, such as organic farmers, by setting the average performance of a region as a point of comparison. This would acknowledge the high carbon levels already achieved by these practitioners. The methodologies for a standardised baseline might be developed later as it is also included in the CRCF, but it is not known when.

Furthermore, the CRCF leaves unresolved how the ongoing maintenance of high carbon stocks in organic farms (54% of the overall potential, European Commission, 2024) will be treated. Recognising and incentivising maintenance seems key to preserve existing gains and to not disadvantage early adopters like organic farmers.

The CRCF applies a narrow approach to calculating carbon as its certification applies at field, not at farm level. Consequently, it does not oblige carbon crediting schemes to consider the carbon balance of the entire farm. This may cause carbon leakage, i.e. emissions are reduced in one area, but are offset by increases in another. Additionally, at the moment carbon farming in the CRCF only covers “the management of terrestrial and coastal environment” (Article 2 (10)) and its resulting carbon storage or soil emission reduction but does not yet include the emissions related to livestock. In 2026, the methodologies for integrating livestock emissions in the CRCF will be developed. This is important as the livestock sector contributes significantly to anthropogenic GHG emissions and mitigation strategies are needed. In the EU, almost half of the agricultural emissions derive from enteric fermentation in ruminants and manure management. The livestock sector is responsible for 81-86% of the GHG emission of agriculture when including the emission related to production, transportation and processing of feed (Peyraud & MacLeod, 2020). However, it remains to be seen if the inclusion of livestock in the CRCF leads to a 'whole farm' approach eventually.

The systemic approach of organic farming offers already climate benefits concerning livestock. It has clear rules regarding stocking density (animals allowed per hectare) to prevent exceeding the land's holding capacity. Additionally, 70 % of the feed for ruminants must come from the farm or from the same region according to the EU organic regulation. In consequence, organic agriculture has lower imports of concentrate

feed from outside the EU and contributes less to global GHG emissions caused by land-use change for feed production.

According to the sustainability criterium of the CRCF, carbon farming must contribute to the “protection and restoration of biodiversity and ecosystems” (Article 7 (2)). With that the CRCF considers the importance of healthy ecosystems and biodiversity in their role for long-term carbon storage and adapting to the impacts of climate change, such as extreme weather events. They are vital for ensuring clean water, air, and fertile soils. However, it is not further spelled out what the biodiversity protection entails. Currently available carbon tools, for instance, do not adequately record biodiversity and other co-benefits of climate-friendly farming practices. The CAP'2ER tool is an exception, that covers several biodiversity indicators, such as presence of hedgerows or crop diversity on the farm. It is difficult to measure biodiversity, and corresponding methodologies are currently being developed by the expert group. It will depend on the chosen methodologies if the CRCF will adequately promote biodiversity and provide sufficient safeguards to prevent that carbon farming practices have negative impacts on ecosystems. It is also to be seen how carbon farming activities with biodiversity benefits will be linked with the new nature credits pursued by the European Commission as another way to reward nature-positive action (see also (Biodiversity) Co-benefits). Moreover, except for the call to ensure mandatory biodiversity co-benefits for carbon farming, whatever that means, only a vague “do no significant harm” principle applies to the sustainability objectives in the CRCF, including climate change adaptation.

Input from National Coordinators of OrganicClimateNET

The National Coordinators emphasise several barriers that prevent farmers from engaging in carbon assessments and carbon farming. A major concern is the high level of uncertainty because relevant policy frameworks are still under development. This lack of clarity contributes to farmers' reluctance to adopt new practices, as they face a “wait-and-see” situation and want to avoid being disadvantaged later as first movers. In this context stakeholders also brought up that different approaches to assessment and ways of calculating carbon in specific methodologies and respective tools would lead to different or even inconsistent results in the carbon balance. Many assessment approaches would calculate carbon based on specific singular practices, whereas the organic approach to farming unfolds as a fully integrated and often diversified and mixed system. There was a suspicion that values in a holistic system would deviate from conventional values.

Additionally, conducting carbon assessments is time-consuming and administratively burdensome, which further discourages participation. Considering that possibilities may be limited to achieve additional carbon to be issued and sold, the burden of MRV seemed not worth the effort, not least because middlemen in the system also withdrew considerable benefit. To reduce bureaucratic burden stakeholders strongly support an integrated MRV approach, where data is collected in just one go, e.g. under the CAP framework. Ideally, the singular data set produced would also satisfy other reporting and verification requirements, such as CRCF certification or even nature credits. Integration is hoped to substantially reduce MRV costs by minimizing duplicated field checks and redundant data submissions. This holds true especially for organic farmers that already collect extensive data for their certification and CAP compliance.

3.1.3 Standards and certification

With increasing legal obligation for corporate sustainability reporting, companies increasingly demand farm data to comply with these requirements.

The **Corporate Sustainability Reporting Directive** (CSRD) ([Directive \(EU\) 2022/2464, version 2025](#)) requires companies above to regularly report on the social and environmental risks they face and on how their activities impact people and the environment based on the European Sustainability Reporting Standards (ESRS). Among other areas, they have to disclose: “(i) climate change mitigation, including as regards scope 1, scope 2 and, where relevant, scope 3 greenhouse gas emissions” (Article 29b (2a)). According to the ESRS, scope 3 emissions

are those that occur in the upstream and downstream value chain of a company, such as emissions from purchased agricultural products.

Similarly, the **Corporate Sustainability Due Diligence Directive** (CSDDD) ([Directive \(EU\) 2024/1760, version 2025](#)) sets obligation to companies to identify and address adverse human rights and environmental impacts of their actions. This applies for the company itself but also for its subsidiaries and the operations carried out by its business partners. Moreover, companies will have to adopt a plan ensuring their business model complies with limiting global warming to 1,5°C. The plan has to contain “(a) time-bound targets related to climate change for 2030 and in five-year steps up to 2050 based on conclusive scientific evidence and, where appropriate, absolute emission reduction targets for greenhouse gas for scope 1, scope 2 and scope 3 greenhouse gas emissions for each significant category. “ (Article 22 (1))

Complementary to these frameworks, the **Empowering Consumers to Green Transition Directive** ([Directive \(EU\) 2024/825](#)) targets greenwashing, early obsolescence and inadequate product information. Vague environmental claims will be prohibited, and companies must substantiate environmental claims. The **Green Claims Directive** (in trialogue) aims to address greenwashing and protect consumers. It will complement and further operationalise the Empowering Consumers to Green Transition Directive by setting a framework for substantiation of voluntary environmental claims.

The **Regulation on Deforestation-free Products** ([Regulation \(EU\) 2023/1115, version 2024](#)) ensures that certain agricultural commodities or products consumed in the EU do not contribute to deforestation or forest degradation globally. An operator must be able to prove this when placing these commodities on the EU market or exporting from it.

These developments indicate a welcome shift towards corporate accountability and more sustainable value chains. However, the sustainability reporting tends to have a narrow focus by only looking at specific aspects of sustainability, like carbon emissions, while neglecting broader environmental and ethical dimensions such as biodiversity or animal welfare. Organic farming, by contrast, is a legally protected, certified production system that delivers a wide range of ecosystem services. Therefore, existing regulated sustainable farming systems, like organic agriculture, should be better integrated in sustainability reporting frameworks to avoid under-acknowledgement of their benefits.

However, providing farm data so that companies comply with the sustainability reporting requirements or can make substantiated claims poses administrative burden to farmers. To address this, the European Commission's Vision for Agriculture and Food proposes a voluntary benchmarking system for on-farm sustainability assessment. This would harmonise the various sustainability standards, certifications and reporting requirements set by public and private actors. An on-farm sustainability compass should enable farmers to monitor and record sustainability data only once, thus reducing administrative complexity. The implementation of an EU-wide sustainability benchmarking system was also a recommendation of the Strategic Dialogue on the future of EU agriculture. However, the effectiveness of this benchmarking system in truly reducing the administrative burden and recognising certified sustainable practices like organic farming remains to be seen.

Inputs from National Coordinators of OrganicClimateNET

Market dynamics and emerging policies are creating pressure for change. The Science Based Target initiative (SBTi) and the upcoming Green Claim Directive are prompting processes that lead to a heightened interest in farm-level data for sustainability reporting. These demands, combined with growing consumer expectations, are increasingly motivating farmers to adopt climate farming practices and engage in the necessary reporting processes. At the same time, consumers are perceived as not perfectly informed on the different concepts of

sustainability that companies use in labelling and reporting, such as "regenerative", "agroecological", "climate-neutral", which limits the options for organic to communicate its unique selling point as climate smart practice.

In this regard the recent rollback on ambition and reporting requirements in the EU policy framework, like in relation to the deforestation free supply chains, provide a further discouraging signal and raise concerns that the carbon farming framework is heading towards a similar situation of watering down climate ambition for the sector. If based only on voluntary commitments of the sector around SBTi and voluntary markets, stakeholders are worried that the system may be misused for greenwashing without leading to more action on the field.

3.1.4 Knowledge Support in the EU

A supportive Agricultural Knowledge and Innovation Systems is a key strategic goal in numerous EU policies. The European Farm-to-Fork Strategy earmarks EUR 10 billion for Research and Innovation particularly under the Horizon Europe programme in relation to food, bioeconomy, natural resources, agriculture, fisheries, aquaculture and environment (Farm-2-Fork Strategy). Likewise, the EU Action Plan for the Development of Organic production (2021-2026) highlights R&I for boosting the sustainability of the agricultural sector across all three axes. Organic farming was a priority area for R&I also under Horizon 2020 and Horizon Europe for the sector to become more sustainable. In the recent Horizon Europe programme phase (2021-2027) the budget was further increased for research on organic. In the Commissioner's vision for "[Agriculture and Food](#)" organic farming is recognised as a model of sustainability, and an innovative sector to be supported, among others, through Research and Innovation. In the Horizon Europe call's Cluster 6 dedicated to "Food, Bioeconomy, Natural resources, Agriculture and Environment" several thematic areas and missions draw strong narrative linkages between sustainable production systems that support the build-up or conservation of organic carbon stocks and the subject of climate change mitigation. Soil health including through projects with a focus on organic practices is a recurring theme in the EU R&I funding landscape, whereas adaptation is covered as own R&I mission. A range of Living labs and lighthouses were already envisaged under Horizon2020 in the context of the "Soil deal for Europe".

The Horizon Europe R&I portfolio around Cluster 6 (in continuation of its predecessor Horizon 2020) covers several multi-actor projects with a certain relevance to the strengthening of AKIS for organic climate farming. A typical more indirect approach in Horizon calls is to ensure that R&I informs practice by actively engaging farmers (and advisory service providers) in demonstration, living lab or field trial activities on innovative farming practices e.g. on climate mitigation or adaptation (like irrigation, e.g. GEORGIA, RAINS) or organic innovations (e.g. breeding). Moreover, the funding programme supports coordination and support actions that have knowledge exchange and peer-to-peer learning in networks at their heart.

In contribution to the AKIS they develop the concrete infrastructure for knowledge exchange with farmers or in support of advisory services building up platforms, curricula or learning material on organic agriculture (OH-FINE, OrganicAdviceNet) or climate smart agriculture (Climate smart advisors). Some coordination efforts seek to foster Europe-wide partnering and coordination among R&I, network or coordination projects on broader themes (e.g. Agroecology partnership or CORE-Organic (Horizon 2020)). On climate farming explicitly there are two relevant pilot network-based projects with strong a peer-to-peer learning and demonstration approach at the nexus to organic farming: the OCNET project (our consortium) and the Climate Farm Demo project (which covers 25% organic farms). The OCNET projects has set out the objective to set up national hubs that could act as Agricultural Knowledge and Innovation System (nAKIS) in each pilot country on the subject of organic climate farming. The project is only in its first establishing period and not fully operable filling a pertaining gap (see reflections of partners). Beyond that there is a range of other more or less specifically AKIS oriented projects:

- **Advisory network projects:** ClimateSmartAdvisors, COREnet, NBSOIL, EU4advice, Stratus, Livenet, AdvisoryNetPest, ForAdvise, OrganicAdviceNetwork
- **AKIS projects:** AKIS: EU-FarmBook, ATTRACTISS, ModernAKIS,
- **Thematic networks:** Renovate & CLIMED-FRUIT, B-THENET & ResAlliance, FOREST4EU, Oper8, BBioNets & TransformDairyNet

Beyond R&I funding, the EU supports AKIS and that new knowledge is available effectively to assist farmers in their transition to sustainable practice: 1) with classical CAP based support of farm advisory (also covering vocational training, demonstration activities, or workshops); 2) through the support of hubs for sharing best practices across countries or the EU, through e.g. operational groups such as the EIP-Agri (European Innovation Partnership for Agricultural Productivity and Sustainability) or the national and EU-wide CAP Networks and Knowledge Platforms (mandated per Art.127 Regulation (EU)2021/2015 “CAP Strategic Plan”). The latter are drawing on a wide range of stakeholders as knowledge holders and recipients including explicitly the advisory services.

As of the CAP Strategic Plan, all Member States are required to establish and support Farm Advisory Services. The Plan even explicitly spells out their role for capacity building and awareness raising regarding environmental and climate topics, including on relevant legal standards and requirements or risk management, digitalisation and precision farming. Advice must be tailored and independent. Specifically, national farm advisory services should be **“tailored to the various types of production for the purpose of improving the sustainable management and overall performance of agricultural holdings and rural businesses, covering economic, environmental and social dimensions, [...] Farm advisory services should help farmers [...] to become more aware of the relationship between farm /land management on the one hand, and certain standards, requirements and information, including environmental and climate ones, on the other hand. (preamble 50 of [CAP Strategic Plan](#), bold by authors).** The strategy goes further in demanding an “interactive” approach to innovation, with multiple actors and complementary knowledge to spread solutions ‘ready for practice’. Member states must spell out in their national plans how advisory services are more prominently strengthened in their AKIS and will be working together with researchers and national CAP networks.

A recent report on AKIS for organic in key European countries (Nagy et al. 2023), revealed that only few countries have fully functioning training and education programmes or advisory services specifically suitable to the knowledge needs of organic farmers or those that would like to convert to organic. Key bottlenecks were the involvement of and collaboration between advisory actors, the exchange between research, education and advisory actors and a lack of organically specific curricula in training and education. An overarching problem appeared to be the general lack of funding linked to policy commitments. Where advisory services rely on European /national research and innovation calls, there is a high risk of discontinuity in availability and quality of support (Nagy et al. 2023).

Critical voices suggest that farm advisory services may eventually end up as narrowly focused only on the ‘must have’ information concerning conditionality rather than advice that covers the full set of environmental and climate interventions and particularly the interactions between them. In practice Member States see advice and knowledge exchange more as an administrative cost, rather than in its role and value for integrating environmental aspects (Hart & Bas-Defossez, 2018). The eco-schemes for instance, require high quality advice and opportunities for knowledge exchange (Runge et al., 2022). Already in their early stages of implementation they were criticised for their high complexity and related problems with the quality of advisory services or opportunities for knowledge exchange among farmers. Eco-schemes

Input from National Coordinators of OrganicClimateNET

For National Coordinators AKIS is key. They emphasise the lack of knowledge as a key barrier to the adoption of organic climate farming practices. Many organic farmers are not yet fully aware of the full climate benefits

that different practices offer for organic specifically, nor do they have specific guidance on how to implement them effectively. Stakeholders found knowledge gaps or limitations existed when it comes to the role of carbon markets (incl. voluntary) for advisors but also regarding business opportunities. Much more knowledge was required particularly for elder generations of farmers, whose scope for trying out something new may be more limited.

Interestingly some stakeholders evaluated the role of knowledge, although indirect, as being more forceful and transformative in the long run than market-based approaches. Oriented at how systems can be developed that are economically viable and sustainable, knowledge may help internalise the value of organic climate farming – a value that needs no additional maintenance support in the longer term to incentivise actions. Where climate action helps save e.g. energy intensive and costly inputs or farmers to achieve and maintain high yields they are adopted more ‘naturally’.

Many R&I projects however, face problems of short-term periods and expiring of funding – including for useful services or tools. Lack of constant finance for research and innovation and related advisory and capacity building services was seen as key. It was found worthwhile to explore possibilities to have companies that benefit from organic climate farming in their value chain to also being the ones to (co-)finance the required advisory services to farmers or trainings for advisors.

The critical role of organic farming associations but also public institutions serving as advisory services was highlighted for capacity building and training efforts. They are valued especially in their ‘unbureaucratic support’ – where existent – and that farmer-community-based structures, compared to more science or public-based approaches, created a valuable sense of community with effective learning from peer-to-peer. The value of region and farm-system specific advice was highlighted too. Often advisory services (at least in some countries) tailor the advice to the specific needs and questions of farmers. Knowledge exchange between different regions was welcomed as exercised in the OCNET project. Singular farmers, serving as lighthouse farms in the OCNET, for instance do hold valuable experience with specific assessment tools or voluntary carbon markets or can share valuable business models for scaling. Policy is seen to play a vital role in enabling such learning environments further. To promote the implementation of organic climate practices, the following support measures were identified specifically:

- Foster formats for peer-to-peer learning to exchange practical experience;
- Lighthouse farms to serve as real-life examples of best practices;
- Dedicated budget for on-farm testing and innovation;
- Expanded training of organic farmers and advisors;
- Strengthened ‘specialised’ advisory services to provide support for (organic) farmers.

3.1.5 Economic viability

Additionality and maintenance in the CRCF

The CRCF ([Regulation \(EU\) 2025/3012](#)) aims to provide farmers with an opportunity to generate additional income by selling their certified carbon credits. However, as discussed in 4.1.2 Carbon assessment, the Q.U.A.L.I.T.Y criterion ‘Additionality’ disadvantages early adopters, such as organic farmers, as current methodologies only include an activity-specific baseline and no standardised baseline. As a result, first movers, who often maintain high carbon levels in their soils, can only demonstrate marginal. This translates into fewer carbon credits and reduced income potential, making the system economically less viable for these farmers. Additionally, the CRCF does not include ongoing maintenance of high carbon stocks as outlined in 4.1.2 Carbon assessment. To improve inclusiveness and economic viability for organic farmers in the carbon market, the development of methodologies for a standardised baseline to better recognise and compensate the past efforts of early adopters as well as acknowledging and incentivising maintenance of carbon stocks are essential.

GAECs and eco-schemes in the CAP

In May 2025, the second CAP simplification package ([COM\(2025\) 236 final](#)) recognised organic farming as “green by definition” for GAEC 1, 3, 4, 5 and 6. This change, which now requires implementation by the Member States, aims to reduce administrative burdens and regulatory mismatches, improving the economic viability of organic farming. However, the extent of its impact will depend on how consistently and effectively it is applied across the EU.

In the current CAP programming period (2023-2027) ([Regulation \(EU\) 2021/2116, version 2024](#), [Regulation \(EU\) 2021/2115, version 2024](#)), a total of €44.7 billion is available for eco-schemes measures in the Member States with potential environmental or climate outcomes. All Member States are expected to earmark 25% of their CAP budget for the voluntary measure. Maintenance or conversion to organic is a core principle in CAP finance for more than a decade:

By 2020, approximately 61.6% of EU land dedicated to organic farming received targeted financial aid. On average, this aid amounted to EUR 144/ha from CAP support and EUR 79/ha from national co-financing (National Organic Support). For the 2023-2027 funding period, a significant portion of the funding from both the European Agricultural Guarantee Fund (EAGF) and the EAFRD will be allocated to support organic farming areas.

However, the current design of eco-schemes allows that single practices are favoured over system approaches like organic farming. This leads to situations where farmers practicing system-approaches like organic farming, can receive less funding than conventional farmers combining several schemes (e.g. eco-scheme on pesticide reduction and eco-scheme on fertilizer reduction). Many of these practices are already standard under organic management or deliver less than a system-based approach. As a result, organic farmers face a lack of comparative advantage even though their farming systems often deliver greater cumulative climate and environmental benefits.

Pillar II income forgone rules

Similarly, in some Member States organic schemes cannot be combined with other eco-schemes or AECMs under Pillar 2, due to restrictive interpretations of ‘no double-funding’ and ‘income forgone’ rules. This limitation, seen in at least countries like Bulgaria, Estonia, Finland, Germany, Ireland, Latvia and Spain, reduces the economic viability of organic climate farming (IFOAM Organics Europe, 2024). Also, the financial incentives seem too low as to outbalance additional practical efforts for farmers or income forgone. Amendments of payment rates were already seen in the first year of the CAP programming period because of low uptake. Under pillar II specifically, EAFRD payments are to strictly follow ‘income forgone’ principles when compensating organic farmers through payments for conversion and maintenance. This calculation supposedly considers yield loss, stocking or variable input costs plus higher premium prices, why payments in conversion phases need to always be higher, which they are not in all countries. Although the double funding principle is justified, the problem pertains that in consumer markets producers do often not achieve the assumed high premiums, while costs for (organic) market development are often ignored entirely (cf. Lampkin et al 2024). Experience with numerous countries shows that CAP conversion and maintenance payments cannot keep many farmers in organic business or only for as long as the CAP programming period lasts. Particularly where consumer willingness to pay is not as expressed, complementary ‘premium’ prices are not sufficiently motivating to stay organic (including in the area of aquaculture; Reinecke et al. 2024). Considering the logic of ‘income forgone’ for additional efforts, costs, or yield losses in relation to certification, the argument of double funding appears somewhat far stretched for justifying to not compensate organic farmers for the delivery of essential public goods. An overly strict approach to environmental additionality based on the generic assumption of organic being green by definition blinds out different quality levels possibly creating fairness problems and competitive disadvantages in consumer markets for certified production.

This system does not reward the climate benefits that organic farming already delivers and does not provide possibilities to remunerate some of the additional climate-friendly practices beyond the scope of the organic regulation. To support the EU's climate targets, the CAP should ensure proportionality between the level of ambition of farm systems and the level of funding, so that farm systems delivering high climate performance, like organic farming, are not disadvantaged.

Nature Credits

The aim of the new initiative of nature credits is to financially reward nature-positive actions, such as restoration of wetlands or extension of forest areas and to incentivise private investment in nature protection and preservation, accordingly, helping to close the biodiversity financial gap. While it is welcome that actions that protect nature are incentivised and remunerated, it is questionable whether nature credits are the right approach or if broader legislative changes and redirection of EU subsidies are needed to effectively halt biodiversity loss. According to a study by WWF, a lot of EU subsidies support activities, especially in the CAP, that harm biodiversity (WWF, 2024). Concerning the certification system for nature credits, it will be complex to develop robust methodologies as measuring biodiversity is difficult. Moreover, it has to be ensured that nature credits do not become a greenwashing tool. Likewise, the system may replicate the shortcomings of carbon credits so that organic farmers may not benefit at the same level financially compared to less sustainable farmers because of additionality considerations. In a way its shape and functioning will be conditioned by national ambition tied to nature restoration law implementation. Considering also the possible trade-offs between high carbon practices and biodiversity objectives a future rewarding scheme needs to avoid perverse incentives and inconsistencies between different markets for distinct ecosystem components (climate regulation vs other ecosystem services).

Investment support

There is a considerable share of CAP support under pillar II going to investments in physical assets (EAFRD measure 04, ca. 20%), or in relation to farm and business development (EAFRD Measure 6, around 6.6% in last programming period). Because Member States specify the concrete conditions for such interventions and funding allocating in line with their own objectives and needs high deviation may exist in implementation of different investment schemes under CAP. Such (partial) grants for investments may be a key component in incentivising the transition to innovative practices. Numerous countries for, in fact, have investment schemes in place oriented at production or processing that are oriented at contributing to climate change mitigation, adaptation, efficient resources use (esp. in irrigation) or animal welfare. Funds are available for both productive or non-productive investments including in natural assets like forests, and for achieving environmental objectives (e.g. in Spain). The specific eligibility criteria as well as limits to funding in specific cases are defined nationally or sub-nationally. The investment into agroforestry system in Germany, for instance, is only provided by 3 out of 16 'Bundesländer', similarly for agri-PV only some Länder, like North Rhine-Westphalia support the investment costs (up to 25% or 1 million), while others rely on the incentives through the guaranteed energy purchasing price as of the German Renewable Energy Law (EEG). On top also the European Investment and Structural Funds (ESI Funds) offer support to producers, SMEs and organic stakeholders in the EU through operational programmes.

Input from National Coordinators of OrganicClimateNET

The National Coordinators emphasised that the prospect of additional income is an incentive for organic farmers to adopt climate farming practices. However, they also noted that organic farmers are particularly hesitant to enter the carbon farming market. One barrier is the significant upfront investment required, which is not matched by adequate financial support under EAFRD. Also, there is a pertaining role model for agriculture among financing institutions what denotes a convincing business case justifying loans or grants that is broadly discouraging going 'green'. Organic farmers face pertaining challenges related to additionality,

a key criterium of eligibility in the carbon farming scheme. Organic farms often already have high carbon content in their soils and maintenance is currently not considered additional. This renders carbon farming often not financially attractive for them. Where only few activities (like tree planting) are additional, the general impression arises that requirements for MRV on carbon farming will eventually only add more paperwork on the desks of farmers without financially encouraging farmers to do more. Several stakeholders questioned whether a tax-based system would eventually be more impactful and beneficial.

The problem with additionality for organic farmers led to a situation where conventional farmers employing a carbon removal practice are given considerable financial advantages over organic farmers. From an organic perspective any additional tonne of carbon implies high efforts and prices in existing carbon markets appeared way too low for organic operators to justify carbon farming as a future option. Moreover, the carbon farming market was seen as highly uncertain, and it remains unclear how much revenues organic farmers can realistically expect.

A considerable amount of the money rewarding for carbon would also “disappear” for middlemen and MRV and other considerable ‘transaction costs’ in the system. Lacking ambition cannot create demand for credits needed to support price levels that provide sufficient incentives for (organic) farmers to adopt additional climate farming practices. Under circumstances of legal void and unclarity where the policy framework was heading to there was eventually a strong hesitation to ‘move first’ and adopt climate farming practices now if it increases the risk to forgo possibilities to capitalise on them in the future because of strict additionality rules.

4 Discussion

This report presents a mapping of the EU policy landscape relevant to supporting organic climate farming as an integrated approach to agriculture. Looking at the broader policy architecture devolving from the Green Deal and its key strategies on agriculture (Farm to Fork), biodiversity, or soil, etc. the objectives and targets spelled out in relation to climate change mitigation, adaptation as well as other key environmental co-benefits are at least at a very general level brought together as mutually constitutive elements of an overall agriculture and food system. In this context, organic is principally acknowledged as role model for sustainable farming, including to achieve climate resilience and sequestration of carbon in (healthy) soils with numerous co-benefits.

However, these essential interlinkages dissolve to a certain extent when looking into the mix of policies and the concrete provisions and measures that support the implementation of more sustainable agricultural practices, including on climate farming. Although there are in fact numerous instruments in place to support and incentivize the uptake of sustainable practices including by providing methodological guidance and standards, it remains questionable whether these policies together unfold in an integrated and ambitious fashion in practice and as needed for incentivising the broad scale uptake of organic climate farming. With a tendency to add more transaction costs onto farmers for reporting on compliance, numerous measures fail to support farmers in transitioning their business towards more sustainable systems but support smaller adjustments without questioning the status quo of doing agriculture. Specifically, organic as such does not receive the recognition of its multiple services to society and is structurally disadvantaged in corresponding financial support schemes particularly under CAP. If implemented as stand, the methodological provisions under the CRCF guidelines risk to unrightfully disadvantage organic. A significant barrier for organic climate farming is a rigid and narrow approach to 'additionality' both in carbon accounting under CRCF and in a strict approach to double funding under CAP. The current approach to baselines under CRCF essentially neglects the critical role of organic farming as first mover to provide key environmental benefits. Organic farmers have by virtue of being early adopters of sustainable farming practices less scope to further reduce inputs, and thus emissions, or to increase carbon stocks (particularly in soils). As of the existing methodological provisions they become practically ineligible for carbon credit-based payments that require a change in practice, whereas their virtue lies in the maintenance and further improvement of practice. This leads to a situation where organic farmers experience a competitive disadvantage over farming methods that perform worse across many different sustainability dimensions including carbon in absolute terms. A problem that may indeed be addressed with an approach drawing on a regional conventional average as originally suggested.

While it will be important to ensure that also organic farmers innovate and develop further in climate smart operations, e.g. by exploring opportunities in the areas of agroforestry, hedges, energy saving or renewable energy installations, etc. it needs to be considered that such efforts are often not low hanging fruits and may be more complicated to install in a working system. Eventually it may be important to avoid that incentives focused on one value (like carbon) creates serious trade-offs in other key environmental areas. Indeed, it is not a good idea to plant trees into peatlands or sensitive grassland landscapes key for biodiversity conservation.

In this respect it remains a problem that comprehensive co-benefits beyond mere safeguards are still absent in the CRCF. It is important as suggested in this report that the methodological guidance currently developed on a future nature credits system is not only comprehensive, but also consistently considered under the future CRCF system. While both crediting systems may be handled for good reasons separately, spelling out the conditions for biodiversity co-benefits within the CRCF framework ensures the environmental integrity of carbon credits not only on paper. The European Commission may draw on existing experience in VCMs and

existing approaches to safeguard or co-benefit certification. From the perspective of organic climate farming systems, mono-dimensional approaches to carbon assessment, particularly those with low environmental ambition regarding safeguards ("do no harm"), raise further concerns about non-additionality, as such safeguards often reflect little more than existing legal requirements and common practice.

A pertaining problem with credit-based systems are the high transaction costs for MRV and the need to find solutions respectful of the justified demands to simplify the system. There is considerable scope for integrating monitoring or data reporting more generally across different policy arenas and rewarding schemes (as further elaborated on in deliverable 4.3 of our project). The high administrative demands in combination with rather low levels of payments have been repeatedly brought up why voluntary measures under eco-schemes or AECM do not fly. However, simplification in reporting is not to be mistaken with a race to the bottom when it comes to the conditions for receiving support.

In this context, carbon and possible nature credit schemes create new reporting obligations and additional administrative burden for farmers. The envisaged MRV frameworks present not only additional funding opportunities for organic farming but may also systematically create administrative burden, and specifically for organic farmers that are already part of another certification scheme (organic). In this context the one-stop reporting as suggested by the Strategic Dialogue and in the Vision for Agriculture and Food is an interesting idea to develop as to reduce administrative burden and transaction costs related to parallel rewarding mechanisms. Thus far, however, reporting for organic certification is not fit for purpose to be included in such joint interfacing (as suggested in the OrganicClimateNET Deliverable D4.3, public document).

Concerning CAP, it may seem like overstretching principles of additionality or no double funding when neglecting to accept that organic may benefit from both premium prices in consumer markets *and* certain eco-schemes and/or AECM under CAP. In fact, however, it raises critical questions as to whether the public should outsource responsibility over important public goods to organic consumer markets, relying on the willingness of consumers to pay more, indirectly sponsoring public goods 'for free' to society. In an alternative arrangement, consumers would benefit from affordable sustainable food instead if critical services like cleaner water, carbon in soil, biodiversity or resilience were principally taken care through public support for public goods. Considering the price volatility in many (incl. organic) consumption markets, linking responsibility over public goods to the financial capacities of (organic) consumers to pay more, poses a major risk. This is to be borne in mind when designing the architecture for nature as well as carbon credits that concern nothing less than agri-ecological ecosystems that ensure food and water security of whole societies.

This also evokes the question how effective CRCF, and carbon (or nature) credits, may become if there is no demand for carbon credits (or possibly other ecosystem services) because regulations are being watered down excluding more and more companies from sustainability ambition and reporting obligations for "simplification" reasons.

Against this backdrop many stakeholders prefer that the future carbon crediting architecture is not transferred entirely into private hands and based on voluntary commitments but at least employs a hybrid approach to public-private finance. With high ambitions underpinning the mechanisms important environmental services to society may be compensated at more appropriate levels and help maintaining their availability to society over the long run. For carbon credits this may be handled under a comparable system to the EU Emission Trading System ETS (or even integrated with it). Because of possible interlinkages of ETS with removals in other sectors and without essential biodiversity or food co-benefits, however, sustainable agricultural approaches to climate farming risk being sidelined in shared markets. This may make a public standard based on high country ambition and respective public procurement obligations more feasible.

Whatever the future system is developed, it needs to ensure integrity with the European policy architecture and incentivises climate and sustainability action from an integrated, cross-sectoral perspective avoiding

piecemeal with little overall effect. In another deliverable we discussed the role of distinct types of rewarding schemes for system transformation and how they need to be designed complementarily to avoid that actions towards sustainability of the sector create the inconsistencies, inefficiencies and unfairness currently seen. A systems-perspective to monetary (together with supportive and regulative measures) is critical for addressing the pertaining challenges in the EU landscape of policies. This integration needs to be oriented at the overarching objectives and not short-sighted activism to calm down particular interests, while ignoring the superiority of more integrated and holistic approach to foster climate farming for society. Our report reaffirms the critical role of piecemeal, compartmentalization, and thematic fragmentation as well as lacking ambition and political commitment in all policy areas from financial support to AKIS. Inconsistencies and goal conflicts become particularly obvious when looking at support for organic climate farming from a broader policy landscape perspective with policy mixes.

As some of the pertaining problems have to do with the handling of CAP payments in two separate pillars, the current proposal by the EC to unify pillars may be one step to overcome some of the problems. However, the proposal seems to somewhat 'outsource' (and possibly compartmentalise further) the governance of critical public environmental goods either to national level policies with considerable variation in their ambition levels or (novel or existing) private markets for organic, carbon or nature credits next to CAP, which holds several risks as explored. The unfolding of the power of national or market ambition, however, will depend highly on the forcefulness and level of ambition of the joint European legal framework (including regulation on methodologies, eligibility and reporting requirements) underpinning these national and market-based mechanisms. Already the existing substantive inconsistencies, loopholes and low levels of ambition raise doubts that a high demand for carbon or nature credits can be generated as basis for price levels that would allow such market to unfold its power to foster change. When looking at the current policy dynamics it seems even more unrealistic that policy will move towards more ambition, rather than further watering down, existing policy frameworks and corresponding commitments. It feels almost pointless to develop market based crediting systems into 'lame ducks' that will never fly, while the time, effort and resources the development consumes could be usefully invested already to address the essential gaps in existing schemes. The overall tendency to create new measures rather than addressing problems in existing adds further insecurity and leads to serious delays. As discussed, the legal void does not motivate farmers to improve practices further but leads to inaction and paralysis, not least because producers that take extra efforts and risks as first movers forgo future possibilities to benefit from the future system, which they helped piloting. This dynamic poses not only a technical but a serious ethical problem for the future development of the sector.

5 Conclusions

The current EU policy landscape supporting climate farming needs to overcome pertaining inconsistencies and compartmentalisation to become future proof and aligned with an integrated approach to organic climate farming. Rather than relying mainly on one specific approach to incentivising transformation in the sector, policy needs to install different and complementary rewarding approaches that combine monetary, results-or-activity based support with supportive structures – especially AKIS – and a solid legal basis. In this respect, the current political dynamics around the reform of CAP seem to be leading to policies that are watering down environmental ambition rather than addressing pertaining inefficiencies, inconsistencies, or administrative burden. Particularly disadvantages remain for particularly sustainable farmers that keep the sector from achieving the objectives of the Green Deal more effectively. Some of the inconsistencies have to do with the handling of CAP payments in two separate pillars and the idea to design direct payments under one pillar may be one approach to overcome them. However, the idea to support farmers exclusively on the basis of area-and/or heads without ringfencing will not support the required transformation of the sector. Moreover, putting responsibility over the design of agri-environmental measures into the hands of Member States only risks leading to further compartmentalisation, inconsistencies and disadvantages for farmers (between countries). In essence, it risks giving up on important principles of common European market and social responsibility. It is moving policy away from key collective objectives of the Green Deal and from thinking agriculture as an integrated socio-ecological food system.

As an alternative to the suggested potentially further disintegrated Member States-based system, the pertaining problems may also be addressed in an approach that combines different approaches to rewarding – where results-based and activity-based incentives may work complementarily with other supportive measures (e.g. on AKIS). Additionally, it may be organised along tiers of progress towards sustainability to reflect the different levels of quality of agricultural climate and environmental measures. Such tiered system could be based on one shared pillar of basic income support for all eligible farmers as suggested at a very basic (incl. financial level) ensuring that critical ecological conditions are secured (including on animal husbandry and corresponding emissions). On top, farmers may qualify for additional support based on activities or verified performance that adhere to shared standards of agroecology and climate and that may be used as a guidance for defining different levels of environmental qualities across different dimensions. Horizontally this system may work with scoreboards reflective of different critical policy objectives concerning water, biodiversity, soil fertility, energy, specifying also the key interlinkages and interdependencies between them.

Additionally, consumption side-oriented levers for policy interventions should be explored further and explicitly beyond industry-oriented schemes in relation to due diligence or sustainability reporting obligations. Incentivizing more sustainable consumption may play a complementary and potentially highly transformational role in addressing pertaining problems in the agriculture and food system. This too may draw on a complementary system of a mix of policies such as support for consumer education and capacity building or instruments that make sustainable products more affordable and widespread, including through public procurement or by incentivizing sustainable diets based on lower taxes, or through a levy on products that have little to offer in terms of sustainability.

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7 Annexes

Annex 1: Add-ons to procedure for the identification of policies

Table A: Chat GPT Thread and answers to verify and pre-assess identified relevant policies

Search query to ChatGPT	ChatGPT Answer
Summary	
<p>I have following questions, could you answer them each individually, also the subquestions?</p> <p>2. Which of these mention directly:</p> <p>2. a) Organic 2. b) Agricultureulture?</p> <p>2. c) Carbon or climate related to agriculture</p> <p>2. d) Carbon or climate related to organic</p> <p>3. Which of the policies are hindering organic farming to improve climate mitigation?</p> <p>4. Which of the policies are hindering organic farming to improve climate adaptation</p> <p>5. Which policies do you see influencing organic farming in acting on climate action? 12.</p>	<p><i>Got it! I'll answer each of your questions and subquestions one by one. Let's dive in:</i></p>
Overview Policies	
<p>1. What are relevant policies?</p>	<p>The following EU policies are particularly relevant to the nexus of organic farming, agriculture, and climate action:</p> <ul style="list-style-type: none"> • European Green Deal: Overarching framework for sustainability in the EU, aiming for net-zero emissions by 2050. • Farm to Fork Strategy (F2F): Focuses on sustainable food systems, aiming to increase organic farming to 25% of EU agricultural land by 2030. • Biodiversity Strategy for 2030: Promotes agroecological practices, including organic farming, as a means of preserving biodiversity. • Common Agricultural Policy (CAP): Provides financial incentives, including eco-schemes, which support organic farming and climate-friendly practices. • EU Climate Adaptation Strategy: Addresses resilience of agricultural systems, including through biodiversity and sustainable land management practices.

	<ul style="list-style-type: none"> • Renewable Energy Directive (RED II): Includes provisions for sustainable bioenergy, indirectly impacting agricultural land use. • Soil Health Law (Drafted): Aims to improve soil health, which ties closely to organic farming practices and carbon sequestration. • Effort Sharing Regulation (ESR): Sets binding national targets for greenhouse gas (GHG) reductions, including in agriculture. • LULUCF Regulation: Regulates emissions and removals from land use, land-use change, and forestry, influencing farming practices. • Zero Pollution Action Plan: Encourages sustainable farming practices, reducing harmful chemical inputs.
<p>Direct links to thematic areas /integration</p>	
<p>A) Link organic</p>	
<p>2. Which of these mention directly: 2.a) Organic</p>	<p>Answer:</p> <ul style="list-style-type: none"> • Farm to Fork Strategy: Explicitly aims for 25% of EU agricultural land to be under organic farming by 2030. • Biodiversity Strategy for 2030: Promotes organic farming as a biodiversity-friendly practice. • Common Agricultural Policy (CAP): Offers specific funding and eco-schemes for organic farming.
<ul style="list-style-type: none"> • Link agriculture 	
<p>2. Which of these mention directly: 2 b) Agriculture</p>	<ul style="list-style-type: none"> • Common Agricultural Policy (CAP): Central policy addressing all aspects of EU agriculture. • Farm to Fork Strategy: Covers the entire food value chain, including sustainable agricultural practices. • Biodiversity Strategy for 2030: Includes sustainable agriculture to protect biodiversity. • EU Climate Adaptation Strategy: Highlights agriculture as vulnerable to climate change and key to resilience. • Effort Sharing Regulation (ESR): Includes agricultural greenhouse gas emissions. • LULUCF Regulation: Targets emissions from agricultural land use.
<ul style="list-style-type: none"> • Integration climate AND agriculture 	
<p>2. Which of these mention directly: 2. c) Carbon or climate related to agriculture</p>	<ul style="list-style-type: none"> • LULUCF Regulation: Specifically targets carbon emissions and sequestration in agriculture and forestry. • Effort Sharing Regulation (ESR): Includes carbon-related goals for agricultural emissions. • Common Agricultural Policy (CAP): Funds eco-schemes promoting carbon-smart farming. • EU Climate Adaptation Strategy: Addresses agriculture’s role in mitigating and adapting to climate change.

<ul style="list-style-type: none"> • Integration climate AND organic 	
<p>2. Which of these mention directly:</p> <p>2. c) Carbon or climate related to organic</p>	<ul style="list-style-type: none"> • Farm to Fork Strategy: Links organic farming to reduced carbon emissions and sustainability. • Common Agricultural Policy (CAP): Funds organic systems as part of eco-schemes, which often relate to climate mitigation. • LULUCF Regulation: Although not explicitly focused on organic farming, supports carbon-smart practices that align with organic principles.
<ul style="list-style-type: none"> • Barriers mitigation 	
<p>3. Which of the policies are hindering organic farming to improve climate mitigation?</p>	<ul style="list-style-type: none"> • Common Agricultural Policy (CAP): <ul style="list-style-type: none"> ○ While CAP provides eco-schemes for organic farming, critics argue that the majority of CAP funding still supports conventional farming practices, which can undercut organic adoption. • Effort Sharing Regulation (ESR): <ul style="list-style-type: none"> ○ Targets for agricultural emissions may incentivize efficiency-focused measures in conventional farming (e.g., precision farming) over transitioning to organic methods. • LULUCF Regulation: <ul style="list-style-type: none"> ○ Focuses heavily on forestry and carbon sequestration without explicitly prioritizing organic farming’s role in carbon-smart agriculture.
<ul style="list-style-type: none"> • Barriers adaptation 	
<p>4. Which of the policies are hindering organic farming to improve climate adaptation?</p>	<ul style="list-style-type: none"> • Common Agricultural Policy (CAP): <ul style="list-style-type: none"> ○ While CAP provides eco-schemes for organic farming, critics argue that the majority of CAP funding still supports conventional farming practices, which can undercut organic adoption. • Effort Sharing Regulation (ESR): <ul style="list-style-type: none"> ○ Targets for agricultural emissions may incentivize efficiency-focused measures in conventional farming (e.g., precision farming) over transitioning to organic methods. • LULUCF Regulation: <ul style="list-style-type: none"> ○ Focuses heavily on forestry and carbon sequestration without explicitly prioritizing organic farming’s role in carbon-smart agriculture.
<ul style="list-style-type: none"> • Influence climate action 	
<p>5. Which policies do you see influencing organic farming in acting on climate action?</p>	<ul style="list-style-type: none"> • Farm to Fork Strategy: Directly promotes organic farming as part of the EU’s sustainability and climate agenda. • Common Agricultural Policy (CAP): Eco-schemes and rural development measures support organic farming’s role in climate action.

	<ul style="list-style-type: none"> • LULUCF Regulation: Indirectly encourages organic practices by valuing carbon sequestration in soils and land management. • Biodiversity Strategy for 2030: Encourages biodiversity-friendly farming, which aligns with organic principles. • EU Climate Adaptation Strategy: Highlights nature-based solutions that overlap with organic farming techniques. • Zero Pollution Action Plan: Aligns with organic farming by targeting reduced chemical inputs in agriculture.
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We asked ChatGPT: What EU policies are particularly relevant for the nexus of organic farming, agriculture, and climate action?

– ChatGPT answered as followed (the result is also shown earlier in **Error! Reference source not found.**, second column):

- **European Green Deal:** Overarching framework for sustainability in the EU, aiming for net-zero emissions by 2050.
- **Farm to Fork Strategy (F2F):** Focuses on sustainable food systems, aiming to increase organic farming to 25% of EU agricultural land by 2030.
- **Biodiversity Strategy for 2030:** Promotes agroecological practices, including organic farming, as a means of preserving biodiversity.
- **Common Agricultural Policy (CAP):** Provides financial incentives, including eco-schemes, which support organic farming and climate-friendly practices.
- **EU Climate Adaptation Strategy:** Addresses resilience of agricultural systems, including through biodiversity and sustainable land management practices.
- **Renewable Energy Directive (RED II):** Includes provisions for sustainable bioenergy, indirectly impacting agricultural land use.
- **Soil Health Law (Drafted):** Aims to improve soil health, which ties closely to organic farming practices and carbon sequestration.
- **Effort Sharing Regulation (ESR):** Sets binding national targets for greenhouse gas (GHG) reductions, including in agriculture.
- **LULUCF Regulation:** Regulates emissions and removals from land use, land-use change, and forestry, influencing farming practices.
- **Zero Pollution Action Plan:** Encourages sustainable farming practices, reducing harmful chemical inputs.

Annex 2: EU policy timeline tool

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	U	V	W	X	Y	Z	AA	AB	AC	AD	AE	AF	AG	AH	AI	AJ	AK		
	2020				2021				2022				2023				2024				2025				2026				2027										
	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1		
1	Policy/ Initiative	Classification	Status	Here to identify what we want to monitor																																			
3	Nature Restoration Law	OCNET-relevant policy	Adopted	Evaluate the national restoration plans in relation to soil carbon.										Proposal tabled by the Commission				Adoption in the Council	Adoption in the Parliament	Agreement among co-legislators				Entering into force of the law															
4	Carbon Removal Certification Framework	OCNET-relevant policy	Adopted											Commission proposal					Council and Parliament agreement	Provisional agreement reached among co-legislators			Entering into force of the law				storage in products consultation followed by comitology										July 2026 to transpose the directive into national law. By July 2026 the Commission should review the inclusion of IPCC source category agriculture, enteric fermentation and manure management.		
5	Soil Monitoring Law	OCNET-relevant policy	Close to adoption	After implementation, evaluation of the national monitoring plans and related results.										EU Parliament request to produce soil protection legislation					Commission adds the soil strategy in its 2023 work programme								Provisional agreement reached between Parliament and Council										expected final vote ahead of law entering into force		
6	Common Agricultural Policy 2023 - 2027	OCNET-relevant policy	reform	Adopted but under simplifications on the way for the CAP										political agreement among the institutions reached					reform adopted																				
7	reform timeline																																						
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OrganicClimateNET

A pilot network of organic farming actors contributing to the uptake of climate farming and its co-benefits for a carbon neutral and climate resilient Europe

GRANT AGREEMENT NO. 101136880

Project funded by



Schweizerische Eidgenossenschaft
Confédération suisse
Confederazione Svizzera
Confederaziun svizra

Swiss Confederation

Federal Department of Economic Affairs,
Education and Research EAER
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**Co-funded by
the European Union**