

17<sup>th</sup> June 2022

Dear BEIS Team

Thank you for your kind attention to this short response specifically on chapter 8 consultation [Developing the UK Emissions Trading Scheme \(UK ETS\) - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/developing-the-uk-emissions-trading-scheme)

### Monitoring Reporting and Verification (MRV) of agriculture and land use GHG emissions

The Agricultural Industries Confederation (AIC) is the UK's leading agri-supply industry trade association. AIC has over 250 Members in the agri-supply trade and represents circa £9 billion turnover at the farmgate, including fertilisers, animal feeds, seeds, crop protection and agronomy and marketing of grain and oilseeds; as well as services (quality and safety assurance schemes) to support progressively sustainable agricultural systems. Annually, the AIC membership invests £50 million in research, is part of a wider community of professional advisers, investing £40 million every year in the transfer of the research and knowledge into innovative solutions for UK farming. A further £9 million per annum is spent on Continuing Professional Development of on-farm advisers.

As a key part of knowledge transfer from agri-supply to farm and from farm to food and drink businesses etc. we are keen to see a solution to the current challenge monitoring, reporting and verification of agricultural and land use greenhouse gas emissions.

AIC welcomes financial support to embed GHG auditing (or GHG relevant KPI benchmarking), action and review into farm businesses and into the agri-supply chain. There is an urgent requirement for transparent common standards or protocols which will also enable the continual improvement of agricultural and land use inventories, and reporting on methane using both methodologies: GWP100 and GWP.

We believe Government has a central role in defining the principles and guidelines together with industry and research.

This intervention would also support the agri-supply chain to farms, UK producers and the food and drink sector to take full advantage of trade opportunities domestically and facilitate UK exports of lower carbon products.



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There's a widespread call for robust GHG balance baselines for different farming systems, sectors and products. While published data does exist there's demand for these to be accessible from a central evidence base, validated and improved. Critically actual data collection and analysis needs to be relatively simple and streamlined to facilitate data exchange through the agricultural supply chain.

Aside but related, we are acutely concerned for the future impact of decisions made on ETS affecting UK fertiliser production and CCAs affecting animal feeds being counter to the interests of the food and drink supply chain. There is great advantage in capitalising on the security EUETS and CCAs have so far provided and could provide for a safe passage to net zero while maintaining a resilient UK supply base for foodstuffs and associated public goods.

Thank you for your attention to these important pressing issues.

Kindest regards.

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

Head of Environment Policy



