ASSOCIATION OF PIG BREEDERS IN BULGARIA (APB)

UNION OF POULTRY BREEDERS IN BULGARIA (UPB)

TO

THE BULGARIAN MEMBERS OF THE EUROPEAN PARLIAMENT

Subject: Upcoming vote in the ENVI Committee on the simplification of the Industrial Emissions Directive (IED) – call to support the opinion adopted by the AGRI Committee

Dear Members of the European Parliament,

We are writing to ask for your support at the upcoming vote in the Committee on the Environment, Climate and Food Safety (ENVI) on the simplification of the Industrial Emissions Directive (IED) for the opinion adopted on 2 September 2026 by the Committee on Agriculture and Rural Development (AGRI). The vote is most likely expected to take place in November 2026, although the exact date has not yet been confirmed.

The simplification of the IED forms part of the "Omnibus VIII" package proposed by the European Commission in December 2025. Chapter VIa of the Directive directly regulates the rearing of pigs and poultry, and the future of Bulgarian farms depends on the final text.

The AGRI opinion, drafted by Rapporteur Christine Singer (Germany, Renew Europe Group), sends a clear message: livestock farms should not be treated as industrial installations. With this opinion, the Committee reaffirmed the European Parliament's 2023 conclusion that the scope of livestock activities under the IED does not belong in a directive aimed at large industrial polluters. We expect the ENVI Committee to take full account of this message from the Members of Parliament responsible for agriculture.

1. What the AGRI Committee Adopted

On 2 September 2026, the AGRI Committee adopted by a large majority the opinion of Rapporteur Christine Singer, with all compromise amendments approved. Among the adopted texts are:

- **Scope.** Return to the thresholds under Directive 2010/75/EC: 40,000 places for poultry, 2,000 places for production pigs (over 30 kg), and 750 places for sows.
- **New and existing installations.** Definitions of "new installations" so that existing farms are not obliged to comply with requirements that cannot be met in older buildings. The new Uniform Conditions for Operating Rules (UCOL) are to apply only to newly constructed buildings.
- **No double reporting.** No duplication of information already submitted under the Common Agricultural Policy or other legislation (e.g. the Nitrates Directive), simplified registration procedures including a registration regime rather than solely a permitting regime, and digital processing.

- **Monitoring.** Monitoring methods adapted to the biological and economic specificities of livestock farming, including data monitoring through equivalent calculation methods.

- **Participation in procedures.** Right to participate in consultation procedures and legal standing solely for directly concerned persons.
- **Transitional period.** A six-year transitional period, i.e. until 2032.
- **Proportionality.** Simplified obligations, a faster and more efficient permitting procedure, penalties adapted to the realities and economic size of farms, a derogation in exceptional cases for exceeding UCOL limit values where no other action can be taken, and the exclusion of livestock activities under Annex Ia from certain provisions on penalties and compensation.

These proposals achieve a realistic balance between environmental objectives and the economic sustainability of livestock farming. We therefore believe that they should be reflected in the European Parliament's position.

2. Why Support Is Necessary

If the revised IED remains unchanged at the end of the legislative process, it will impose disproportionate administrative, financial and investment requirements on family farms and small and medium-sized operators. This is a particularly serious problem for Bulgaria, where, due to the structure of the pig farming sector, 95% of operators would fall within the scope of the Directive. This contradicts the original objective of the 2024 IED amendments, when the thresholds for pigs were lowered and were expected to affect only 30% of operators across the EU.

Maintaining the current thresholds would accelerate market concentration, weaken the EU's production capacity and shift consumption towards imports without commensurate environmental benefits. In practice, the outcome could prove to be the exact opposite of what was intended.

Livestock farming should not be treated by default as an industrial activity. The simplification of the IED must ensure that environmental objectives are achieved without jeopardising the viability, competitiveness and diversity of European farms, including Bulgarian ones.

3. The Commission's Clarifications on Chapter VIa

The latest version of the European Commission's Questions and Answers document on the IED shows that key issues for pig and poultry farming remain open pending the conclusion of "Omnibus VIII". Chapter VIa contains the special provisions for the rearing of poultry and pigs and applies to activities reaching the thresholds set out in Annex Ia (Article 70a).

- **Calculation of Livestock Units (LSU).** Questions regarding the calculation of LSUs on pig farms (including for suckling piglets) and whether pullets are considered poultry have been removed. The document explicitly does not cover provisions subject to the "Omnibus VIII" proposal, as the legislative process is still ongoing. This suggests that the Commission intends to retain at least its proposal to exclude suckling piglets from the LSU calculation. For pullets, the Council has officially proposed a coefficient of 0.007, which could be incorporated directly into Annex Ia.
- **"Places" or LSUs.** Member States may use the "places" (capacity) criterion solely to identify installations falling within the scope of the 2010 IED. When transposing Chapter VIa, they are required to apply the LSU-based approach.

These clarifications demonstrate that without an amendment to the Directive itself, the LSU-based approach remains mandatory. Moreover, the current wording of Article 70b is considerably broader than that proposed by AGRI, and until guidance is published in 2028, operators will continue to operate in legal uncertainty. Therefore, Parliament's position on the scope is decisive.

4. Our Request for the ENVI Vote

We kindly ask you, at the vote in the ENVI Committee and subsequently in plenary, to support the texts adopted by the AGRI Committee, and in particular:

- the 2010 scope thresholds – 40,000 places for poultry, 2,000 places for production pigs and 750 places for sows;
- the exclusion of suckling piglets from the LSU calculation, as proposed by the Commission in "Omnibus VIII";
- simplified registration procedures and the avoidance of duplication with the CAP and other legislation;
- the application of UCOL exclusively to newly constructed buildings, an assessment of their impact, and a six-year transitional period until 2032.

We count on the Members of the ENVI Committee to insist that the AGRI opinion be reflected in the compromise texts, and on all Bulgarian Members of the European Parliament to support this position within their respective political groups.

We stand ready to provide you with additional information and data on Bulgarian pig and poultry farming, as well as to meet with you or your assistants at a time convenient for you.

Thank you for your attention and support.

Yours sincerely,

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