

EXECUTIVE SUMMARY SHEET

Proposing Ministry/Body	Ministry of Agriculture, Fisheries and Food/Directorate-General for Agricultural Production and Markets Ministry for Ecological Transition and Demographic Challenge	Date	05/12/2025
Title of the Regulation	Royal Decree amending the annexes to Royal Decree 988/2022 of 29 November governing the General Register of Best Available Techniques on Livestock Holdings and the support for the calculation, monitoring and notification of emissions in livestock farming, and amending various regulations in agricultural matters		
Type of report	Normal <input checked="" type="checkbox"/> Abbreviated <input type="checkbox"/>		
TIMELINESS OF THE PROPOSAL			
Subject	The amendment of the annexes to Royal Decree 988/2022 of 29 November is regulated in order to adapt them to the new national and Community regulations, and technical adjustments are introduced.		
Objectives pursued	Adapt the ECOGAN regulations to the new national and European Union regulations, and technically improve the annexes for a better application of the regulation.		
Main alternatives considered	<p>Since this involves amendments to the annexes of a highly technical nature, it is not possible to provide assessments on alternatives that are not connected to this regulation, and that are not regulatory.</p> <p>Failure to introduce the amendments would undermine the objective of the regulation, which is the measurement and control of emissions from livestock farming.</p>		
CONTENT AND LEGAL ANALYSIS			
Type of regulation	Royal Decree that modifies the annexes of a basic regulation.		
Structure of the Regulation	An explanatory memorandum in the preamble, a single article and a final provision.		

Reports collected	<p>The following reports will be collected:</p> <ul style="list-style-type: none"> • Report 26.5.4 of the General Technical Secretariat (SGT) of the Department • Report 26.9 of the Ministry of the Presidency, Justice and Relations with the Courts. • Report 26.5.6 of the Ministry of Territorial Policy and Democratic Memory on the alignment of the draft with the constitutional distribution of powers. • Report 26.5.4 of the Ministry of Ecological Transition and Demographic Challenge. • Environmental Advisory Council. • Technical rules and regulations. • Expert Opinion of the Council of State. 	
Hearing process	Consultation of autonomous communities and the sector, and public hearing and information process.	
IMPACT ANALYSIS		
COMPLIANCE WITH THE ORDER OF COMPETENCES	This Royal Decree is issued under Article 149(1), provisions 13 and 23, of the Spanish Constitution, which confer on the State exclusive competence in matters of, respectively, bases and coordination of the general planning of economic activity, and basic legislation on environmental protection, without prejudice to the powers of the Autonomous Communities to establish additional protection standards.	
ECONOMIC AND BUDGETARY IMPACT	General impact on the economy.	It has no relevant effects.
	With regard to competition	<input type="checkbox"/> X The Regulation has no significant impact on competition. <input type="checkbox"/> The Regulation has positive effects on competition. <input type="checkbox"/> The Regulation has negative effects on competition.
	With respect to administrative burdens	<input type="checkbox"/> It entails a reduction in administrative burdens Estimated quantification: <input type="checkbox"/> X It incorporates new administrative burdens. Estimated quantification: €62,100. <input type="checkbox"/> It does not affect administrative burdens.

	<p>With respect to budgets, the Regulation:</p> <input type="checkbox"/> Affects the budgets of the State Administration. <input type="checkbox"/> Affects the budgets of other Regional Administrations.	<input type="checkbox"/> involves an expense: <input type="checkbox"/> involves an income. IT DOES NOT AFFECT THE BUDGETS OF THE GENERAL STATE ADMINISTRATION OR OTHER TERRITORIAL ADMINISTRATIONS
GENDER IMPACT	The Regulation has the following gender impact:	Negative <input type="checkbox"/> None X Positive <input type="checkbox"/>
IMPACT DUE TO CLIMATE CHANGE	Positive.	
OTHER IMPACTS CONSIDERED	Positive environmental impact. No impact on family or on children, nor on equal opportunities, non-discrimination and universal accessibility for persons with disabilities. In addition, the process of drafting this Regulation took into account the principles set out in Law 20/2013 of 9 December 2013 on a market unity guarantee, such as the necessity and proportionality of the Regulation.	
OTHER CONSIDERATIONS		

REPORT ON THE REGULATORY IMPACT ANALYSIS OF THE DRAFT ROYAL DECREE AMENDING ANNEXES D OF ROYAL DECREE 988/2022 OF 29 NOVEMBER 2022, GOVERNING THE GENERAL REGISTER OF BEST AVAILABLE TECHNIQUES IN LIVESTOCK HOLDINGS AND THE SUPPORT FOR THE CALCULATION, MONITORING AND NOTIFICATION OF LIVESTOCK EMISSIONS, AND AMENDING VARIOUS REGULATIONS IN AGRICULTURAL MATTERS.

This report was prepared in accordance with Article 26(3) of Law 50/1997 of 27 November 1997 of the Government, and Royal Decree 931/2017 of 27 October 2017 governing the Regulatory Impact Analysis Reports.

I. TIMELINESS OF THE PROPOSAL

a) Rationale.

The European Green Deal envisions the design of a fair, sustainable, healthier, and environmentally friendly food system that is accessible to all, is one of the policies to transform the EU's economy for a sustainable future.

Within this framework, Royal Decree 988/2022 of 29 November, governing the General Register of the Best Available Techniques on Livestock Holdings and the support for the calculation, monitoring and notification of livestock emissions, and amending various regulations in agricultural matters, regulates the General Register of the Best Available Techniques on Livestock Holdings, establishing, among other issues, the data necessary for its completion.

The annexes to the aforementioned Royal Decree currently lay down the basic data to be communicated by the farms corresponding to the porcine and avian species which, at the time of entry into force of the Royal Decree, had the obligation to communicate the corresponding information to the Register, in application of the livestock management regulations. With the publication and entry into force of Royal Decree 1053/2022, of 27 December, establishing basic rules for the management of bovine farms, this obligation also extends to certain types of bovine farms. It is therefore necessary to amend the annexes accordingly, to include the information concerning this species.

Furthermore, in order to ensure the proper implementation in Spain of the new provisions introduced by Regulation (EU) 2024/1244 of the European Parliament and of the Council of 24 April 2024, on the reporting of environmental data from industrial installations, establishing an Industrial Emissions Portal and repealing Regulation (EC) No 166/2006, it is necessary to adapt the contents of the annex to the aforementioned Royal Decree 988/2022. This is done, for example, by expanding the lists corresponding to the types of fuels used on the farm.

Finally, with the aim of improving the quality of the information in the Register and the understanding of some concepts, definitions in the annexes are corrected, which, in practice, generated doubts or different interpretations.

b) Objectives.

This Royal Decree aims to:

- Adapt ECOGAN's regulations to the new national and European Union regulations.
- At the same time, technically improve the annexes, for a better application of the standard.

c) Principles of Good Regulation.

This Royal Decree has been drafted pursuant to the principles of good regulation provided for in Article 129 of Law 39/2015 of 1 October, on the Common Administrative Procedure of Public Administrations. It complies with the principles of necessity and effectiveness; its adoption is necessary for proper alignment with national and Community regulations and for the technical improvement of the standard. It is the most appropriate instrument, since, for this purpose a Royal Decree must be amended, which must be done by a standard of the same rank. In compliance with the principle of proportionality, the draft contains the necessary regulation to meet the objectives of the standard, without imposing measures that restrict rights, or impose fewer obligations on the addressees. It complies with the principle of legal certainty, since its regulatory initiative is exercised in a manner consistent with the rest of the national and European Union legal system to generate a stable, predictable, integrated, clear and secure regulatory framework, which facilitates its knowledge, understanding and application and, consequently, the actions and decision-making of individuals and companies. It also complies with the principle of transparency, since the public consultation process has been carried out in order to obtain the opinion of citizens and the most representative organisations potentially affected by the regulation, as well as the Autonomous Communities. Finally, it complies with the principle of efficiency, since its application imposes the minimum administrative burdens necessary to achieve its purpose, and allows for efficient management of public resources.

d) Alternatives.

The non-adoption of a regulatory measure is ruled out, given that it is the amendment of the annexes, with markedly technical modifications, so that assessments cannot be offered on alternatives other than the application of this regulation, and not regulatory ones, without soft law alternatives being possible given the mandatory (and not dispositive) nature of administrative law.

Failure to introduce the amendments would undermine the objective of the regulation, which is the measurement and control of emissions from livestock farming.

The envisaged regulation is limited, as explained above, to that which is necessary to adapt the current regulations to the current situation, and which must have a regulatory basis.

e) Regulatory Annual Plan.

This regulation is not included in the PAN 2025, approved by Agreement of the Council of Ministers of 15 April 2025, since when the proposal for it was drawn up by this Ministry, there was no intention to amend the annexes to Royal Decree 988/2022 of 29 November; the need for which arose subsequently.

However, this aspect does not invalidate the regulation, as recognised in STS 1759/2024 of 4 November, Appeal No: 1006/2023, Legal basis 4.2: “2. As it was not provided for in the Annual Regulatory Plan, its inclusion in that instrument is certainly required by the principle of transparency, but it is not a procedural public policy requirement under Article 129 of Law 39/2015 of 1 October, on the Common Administrative Procedure of Public Administrations. In any case, Article 2(5) of Royal Decree 286/2017, which regulates this instrument, provides that regulatory initiatives not included in the Annual Regulatory Plan may be submitted to the Council of Ministers, which must be justified in the Regulatory Impact Analysis Report, as has occurred (see epigraph I(5)).”

II. CONTENT AND LEGAL ANALYSIS

Content.

The draft Royal Decree consists of a preamble, a single article, and a final provision.

The single article modifies Articles 5 and 12, and the annexes of Royal Decree 988/2022, of 29 November.

Article 5 provides that all farm operators will have to communicate, on an annual basis, only the mandatory data in Annex I that have undergone amendments with respect to the previous communication. The inclusion of new fields and the modification of some of the existing fields in the Registry make it necessary for all livestock farmers to make the declaration on an annual basis.

The sanctioning regime referred to in Article 12 is updated with the reference to Law 30/2022 of 23 December, which regulates the management system of the Common Agricultural Policy and other related matters.

A new Section (3) is introduced in Annex I to cover emissions from the bovine sector.

In Section 1 (porcine species), technical adjustments are made. For example, in Subsection A, Sub-subsection k), the year of the last review of the Integrated Environmental Authorisation is established as a mandatory field; in Subsection e), the activity of the farm during the year of declaration is added and the alphanumeric series is reordered, etc.

In Section 2 (avian species), technical adjustments are also made, such as including the anaerobic digester option in Subsection B, second Sub-subsection b) i, in Subsection F indicating the marketing company, etc.

Regarding Annex II, the changes are as follows:

In Section 1 (porcine species), the definition of 'transition piglets' is amended as indicated in red (weaned animals that are not slaughtered and are reared until they reach the fattening stage), the duplication of 'sows in first gestation' is corrected (by deleting Subsection 7), the word 'breeding' is added to young and adult boars, and the definition of 'replacement sows' (unmated sows intended for replacement of breeding stock) is amended.

In Section 2 (avian species), the definitions of 'turkeys' are amended, leaving the definitions of 'male fattening turkeys' (animals present in housing dedicated to the keeping of male turkeys for meat production), 'female fattening turkeys' (animals present in housing dedicated to the keeping of female turkeys for meat production), 'female breeding turkeys' (male/female turkeys in the breeding phase of future production/breeding turkeys), and 'male and female turkeys for meat rearing' (male or female turkeys in their first weeks of life intended for breeding before the production/breeding phase); and in productive categories of laying birds, the new categories of 'white breeding hens' (laying hens in breeding phase of future laying/breeding hens), 'blonde laying hens' (blonde hens in breeding phase of future laying/breeding hens), and 'free-range hens' (free-range hens in breeding phase of future laying/breeding hens) are added.

Finally, the new Section 3 is introduced for the bovine species, considering the productive categories in Dairy Cattle, the productive categories in Beef Cattle, and the productive categories in Suckler Cow.

The final provision establishes the entry into force of the regulation.

A final provision with the jurisdictional authority is not included, since the enabling jurisdictional rules of Article 149(1) of the Spanish Constitution are the

same as those of the Royal Decree whose annexes are now amended. The Methodological Guide for the Preparation of Regulatory Impact Analysis Reports, approved by the Council of Ministers on 11 December 2009, establishes that "it shall not be necessary to identify the specific jurisdictional authority applicable to provisions that have a (...) purely modifying character of rules that included the corresponding jurisdictional authority if the same is not to be modified (...)". It is therefore not necessary to cite these jurisdictional authorities, as they are clearly identified. This Royal Decree is purely a modification of a regulation that already includes the corresponding jurisdictional authorities, and these should not be modified.

Legal Basis

The scope of the Royal Decree is adequate, as it amends a regulation of equal scope.

From the perspective of formal legality, the draft also complies with the general conferral of regulatory powers to the Government in Article 97 of the Constitution, further delegated to the Council of Ministers in Article 5(1)(h) of Law 50/1997 of 27 November, of the Government.

In addition, it is worth remembering that, despite the initial requirement of a formal law for the establishment of basic rules (STC 1/1982), the Constitutional Court recognises that this obligation is not absolute and, consequently, admits that, exceptionally, the bases can be established by means of regulatory rules. In this regard, the Constitutional Court itself has specified that the use of regulations to establish bases is justified when "it is an indispensable complement to ensure the minimum common denominator established in the basic legal norms" (as, among others, in SSTC 25/1983, 32/1983 and 48/1988) or that it is possible to establish the bases through regulatory rules "When, due to the nature of the matter, they are a necessary complement to guarantee the achievement of the objective purpose to which the state's competence over the bases responds" or when formal law is not the ideal instrument to exhaustively regulate all the basic aspects of the matter due to their "highly technical nature or their circumstantial and changing nature" (for all, STC 131/1996), which is the case in this Royal Decree, in which the basic aspects are covered by Law 7/2021, of 20 May, on climate change and energy transition, the Law on integrated pollution prevention and control (IPPC), approved by Royal Legislative Decree 1/2016, of 16 December, and Law 34/2007, of 15 November, on air quality and protection of the atmosphere, with the Royal Decree setting out technical aspects.

Finally, the appropriateness of the status of the draft Royal Decree is also in accordance with Article 24(1)(c) of Law 50/1997, of 27 November, of the Government, which requires that decisions approving regulations under the powers of the Council of Ministers take the form of royal decrees.

Relationship with other regulations of domestic and European Union law.

The regulation is intertwined with Royal Decree 1053/2022 of 27 December, which establishes basic rules for the management of bovine farms, with the aforementioned laws, with Article 10 of Royal Decree 818/2018 of 6 July, on measures to reduce national emissions of certain atmospheric pollutants, Royal Decree 815/2013 of 18 October, approving the Regulation on industrial emissions and implementing Law 16/2002 of 1 July, on integrated pollution prevention and control, Royal Decree 508/2007 of 20 April, regulating the provision of information on emissions under the E-PRTR Regulation and integrated environmental authorisations, and Royal Decree 163/2014 of 14 March, creating the register of carbon footprints, offsetting and carbon dioxide absorption projects. This is also true regarding the proper implementation in Spain of the new provisions introduced by Regulation (EU) 2024/1244 of the European Parliament and of the Council of 24 April 2024, on the reporting of environmental data from industrial facilities, establishing an Industrial Emissions Portal and repealing Regulation (EC) No 166/2006.

Entry into force.

The first final provision of the draft establishes that the Royal Decree shall enter into force on the day following its publication in the Official State Gazette.

In this regard, it should also be borne in mind that the factual assumption of the specific rule provided for in Article 23 of the Government Law does not apply in this case, since the proposed rule does not impose 'new obligations on natural or legal persons engaged in an economic or professional activity as a result of the exercise of that activity', and since this draft is more favourable for livestock holdings, in particular bovine holdings (which will have the method for calculating emissions), and the system of annual communication is clarified, providing legal certainty to it. Therefore, the new provisions must be applicable immediately, without waiting until 1 January or 31 July 2026.

This regulation shall remain in effect indefinitely.

Repeal of regulations.

This draft does not repeal any regulations.

III. PREVAILING JURISDICTIONAL AUTHORITY

This Royal Decree is issued under Article 149(1), provisions 13 and 23, of the Spanish Constitution, which confer on the State exclusive competence in matters of, respectively, bases and coordination of the general planning of economic activity, and basic legislation on environmental protection, these being the enabling heads of competence of Royal Decree 988/2022 of 29 November.

The draft respects the doctrine of the Constitutional Court. Thus, with regard to Rule 13, in Judgement 58/2015 of 18 March, Legal basis 2, it is clarified that: 'In general, as has been recognised by constitutional doctrine, the State's competence in the bases and coordination of economic planning is projected onto the livestock subsector, given the recognised and express relationship it has with general economic policy (SSTC 145/1989, Legal basis 5; 158/2011 of 19 October, Legal basis 8 and 207/2011, of 20 December, Legal basis 7). Thus, the Court has held that it is for the State, pursuant to its responsibility for general organisation of the economy, to establish the overall guidelines for the organisation and regulation of the national agricultural market, leaving it to the Autonomous Region to adopt, within the framework of those general guidelines, any measures which are not contrary to them but complementary, concurrent or neutral, in such a way that, if they are aimed at improving the structures of its own agriculture and livestock farming, they do not interfere negatively or distort the general organisation established by the State, instead either aiding it or being innocuous to state organisation. In addition, the Court has recognised the powers of the Autonomous Region to adopt the necessary provisions in addition to European law and to implement and apply community legislation within their territorial scope provided that, *ratione materiae*, the Autonomous Regions have such powers and do not exceed the boundary established by community and basic national or coordinating legislation (STC 104/2013 of 25 April 2013, Legal basis 5).

With regard to Rule 23, it was already clear from STC 149/91 of 4 July, Legal basis I.D, that "It should be stressed already at this time, that the terms in which the Constitution (Article 149(1)(23)) includes the exclusive competence of the State concerning the protection of the environment offer a peculiarity that cannot be disregarded when establishing their precise meaning. Here, as elsewhere (e.g. in Articles 149(1) paragraphs 13, 16, 18 and 25), the Constitution does not use the concept of bases, but rather that of basic legislation, which it also uses in other paragraphs (17 and 27) of the same Section 1 of Article 149. Contrary to what happens in these, however, it does not explicitly add (as in Article 149(1)(27)), nor implicitly admit (as in 149(1)(17)) that the development of this basic legislation can be assumed, as its own competence, by the Autonomous Communities, but it specifies that the possible regulatory competence of the latter is to "establish additional protection rules".

Although this wording of the Constitution naturally leads to the conclusion that the constituent did not intend to reserve to the legislative competence of the State only the establishment of basic provisions in need of further development, but, on the contrary, understood that it was for the State to establish all the legislation that it considered indispensable for the protection of the environment (without prejudice, of course, to the fact that this common protectionist standard was improved, so to speak, by the Autonomous Communities) and although, in fact, some Statutes of Autonomy comply precisely with this understanding (such as the Statute of Autonomy of Galicia, Article 27(30); the Statute of Autonomy of Valencia, Article 32(6); the Statute of Autonomy of the Balearic Islands, Article

(11)(5), by limiting ourselves to the Autonomous Communities involved in the present actions that have assumed regulatory powers), there are other Statutes of Autonomy (such as the Statute of Autonomy of the Basque Country, Article 11(1)); the Statute of Autonomy of Catalonia, Article 10(6) and the Statute of Autonomy of Andalusia, Article 15(17)) that attribute the corresponding Autonomous Community competence to develop the State's basic environmental legislation

This attribution is undoubtedly legitimate, since by specifying that the State has exclusive competence for basic legislation on environmental protection, 'without prejudice to the powers of the Autonomous Communities to lay down additional protection standards', the Constitution does not exclude the possibility that the Autonomous Communities may also develop, by means of legal or regulatory rules, State legislation, where their Statutes have specifically attributed this competence to them. The mandatory interpretation of the Statutes in conformity with the Constitution means, however, that, in environmental matters, the State's duty to leave room for the development of basic legislation by the Autonomous Community legislation is lower than in other areas and that, consequently, it is not possible to affirm the unconstitutionality of the State regulations by arguing that, given the detail with which they are conceived, they do not allow for any further regulatory development."

There is no history of conflict in this area.

IV. DESCRIPTION OF THE PROCEDURE.

This provision is processed in accordance with Article 26 of Law 50/1997 of 27 November.

The prior public consultation was carried out in accordance with Article 26(2) of Law 50/1997, of 27 November, between 12 and 26 June 2025. A table containing the comments received and the position of this Ministry on the matter is contained in the annex.

In accordance with **Article 26(6)** of Law 50/1997 of 27 November, the public hearing and information procedure has been carried out, through the publication of the draft on the website of the Ministry of Agriculture, Fisheries and Food (from 22 August to 11 September 2025, both included). In addition, the direct hearing with the most representative entities of the sector was conducted by email. Furthermore, pursuant to Article 3(1)(k) of Law 40/2015 of 1 October on the Legal Regime of the Public Sector, the draft has been submitted for consultation with the autonomous communities. A table containing the conversations received and the position of this Ministry on the matter is contained in annex II.

The report from the Technical Secretariat of the Department has been requested, which is issued without observations and that of the Ministry for Ecological Transition and Demographic Challenge, both in accordance with **Article**

26(5) Para. 4, of Law 50/1997 of 27 November. The latter was issued on 7 November, making a series of observations that are mostly incorporated into the draft and the MAIN. Regarding observation 2 on Annex I, while it is agreed that there is a single declaration platform for livestock farmers, to date it has not been possible to introduce on-farm waste generation as a declaration because it has been necessary to be prioritise development for the different livestock species. It cannot be provided in a Royal Decree that they declare in ECOGAN something that has not been prepared. However, there is active collaboration with them to assess its feasibility and, if achieved, it will be included in the corresponding annex.

On the other hand, after assessment, it is not considered necessary to provide for an ex post evaluation of the Royal Decree because none of the legally established conditions for making such an evaluation mandatory are met, nor are there any other factors that would warrant such an evaluation. However, this is a rule whose constant application allows direct managers, autonomous communities and interested parties, as well as the General State Administration itself, as coordinator of the system, to assess any new needs that may arise and to identify opportunities for improvement based on practical experience; reasons which have also justified the amendment that is now being undertaken, so it is considered that the ex post evaluation will be carried out through these channels.

On 19 August, the Report of the Office on Regulatory Coordination and Quality of the Ministry of the Presidency, Justice and Parliamentary Relations of 28 April (Article 26.9 of Law 50/1997 of 27 November) was requested, in accordance with Article 2(1) of Royal Decree 1081/2017 of 29 December, which lays down the operating conditions for the Office on Regulatory Coordination and Quality.

On 20 August, the report of the Ministry of Territorial Policy and Democratic Memory was also requested regarding the alignment of the draft with the order of constitutional distribution of powers (26(5), sixth paragraph, of Law 50/1997 of 27 November). The report was issued on 2 September without comments.

On 8 September, it was requested to submit the draft for consideration by the Advisory Council on the Environment (CAMA), in accordance with the provisions of Article 19 of Law 27/2006 of 18 July, regulating the rights of access to information, public participation and access to justice in environmental matters. This request was reiterated on 14 October and on 3 November.

This Royal Decree shall be subject to the procedure provided for in Directive (EU) 2015/1535 of the European Parliament and of the Council of 9 September 2015, laying down a procedure for the provision of information in the field of technical regulations and of rules on Information Society services, as well as the provisions of Royal Decree 1337/1999 of 31 July, regulating report-

ing in the area of technical standards and regulations related to Information Society services.

Prior approval from the Minister for Digital Transformation and Public Administration is not required, since the draft, in light of its content, does not affect the matters referred to in the **Article 26.5, fifth paragraph**, of Law 50/1997, of 27 November.

Finally, the required opinion will be requested from the Council of State, in accordance with the provisions of Article 22(3) of Organic Law 3/1980 of 22 April, of the Council of State.

V. IMPACT ANALYSIS.

5.1 Economic impact.

5.1.a) *Overall economic impact*

This analysis is carried out for the purposes provided in Article 26(3)(d) of Law 50/1997 of 27 November, and Article 2(1)(d)(1) of Royal Decree 931/2017 of 27 October.

Thus, the regulation lacks general economic impact, although it is intended to provide the livestock sector with the tools to measure its emissions impact.

SME test

It should be noted that the interests of small and medium-sized enterprises, which make up the vast majority of pig, poultry and bovine farms, have also been taken into account in the drafting of the regulation, within the framework of the European Commission's "*Think Small First*" principle enshrined in the "*Small Business Act*" for Europe: an initiative in favour of small businesses, for which the administrative burdens have been reduced to the bare minimum (total cost of €62,100 per year), given that the ECOGAN system operates on the basis of data available to the Administration (which the farmer only has to confirm or modify), automatically generating estimates of greenhouse gas emissions, resource consumption and nitrogen and phosphorus excreta without the need for further action by livestock companies, which, with this system, comply with the environmental obligations laid down in the regulations regarding the aforementioned emissions.

5.1.b) *Impact on market competition*

The draft has no effect on market competition as it does not introduce elements that distort competition in the market, does not involve restrictions on new entrants and does not limit the freedom of operators to compete.

5.1.c) *Impact on the single market*

This standard does not affect Law 20/2013 of 9 December 2013 on the guarantee of the single market and does not involve restrictions on new operators.

5.2. Budgetary impact.

The analysis of this aspect is carried out pursuant to Article 26(3)(d) of Law 50/1997 of 27 November, and Article 2(1)(d)(2) of Royal Decree 931/2017 of 27 October.

a) Budgetary expenditures:

The draft does not involve budgetary expenditures for the General State Administration.

b) Financing of budget expenditures:

Not applicable

d) Indicators.

Not applicable

e) Revenues.

The draft does not affect the revenue of the General State Administration.

f) Other expenses.

The draft does not affect the staff expenditure of Public Administrations, nor allocations, remunerations or any other expenditure of a similar nature.

g) Other Administrations.

The draft does not affect the budgets of other Territorial Administrations.

5.3. Analysis of administrative burdens.

The burdens are analysed in accordance with Article 26(3)(e) of Law 50/1997 of 27 November, and Article 2(1)(e) of Royal Decree 931/2017 of 27 October.

Administrative burdens refer to all administrative tasks to be carried out by businesses or citizens in order to comply with the obligations derived from the Regulation.

As regards the possible creation of such burdens by the draft, Article 2(1)(e) of Royal Decree 931/2017 of 27 October, governing regulatory impact analysis reports requires the text of this document to include 'identification and measurement of said administrative burdens'.

Consequently, an impact analysis of the proposal is carried out, identifying the following new burdens:

First communication from bovine farms, in accordance with Article 5 of Royal Decree 988/2022 of 29 November, in relation to its annexes. Population: 150 bovine livestock (according to Livestock Surveys, SITRAN, new Group III holdings, and Group IV farms¹) and turkey holdings (according to SITRAN): 900 holdings.

Annual communication (Article 5 of Royal Decree 988/2022). Population: 30,000 farms (which are the ones that were already required to notify ECOGAN).

Burden	Art.	Type	Cost	Population	Total (€)
First communication	5.1	6	2	1,050	2,100
Annual communication	5.1	6	2	30,000	60,000

Total burden: €62,100.

5.4. Gender impact.

The purpose of gender impact reports is to analyse and assess the potential results of adopting the Standard from a perspective of suppressing inequalities and the contribution of the Standard towards achieving the objectives of equal opportunities and equal treatment for women and men based on baseline indicators, expected results and the expected impact. The gender impact report is a tool for collecting information on social realities, from a gender perspective, for all citizens affected by the Regulation, in order to identify and assess the various effects that seemingly neutral regulatory provisions could have on women and men and, ultimately, to identify any potential existing inequalities and the possible effects of the proposed regulation on both sexes.

With regard to the gender impact analysis of this draft, in accordance with the provisions of article 19 of Organic Law 3/2007 of 22 March, for effective equality between women and men, and Article 26(3)(f) of Law 50/1997 of 27 November, we must start from the fact that the regulations aim to introduce amendments to Royal Decree 988/2022 of 29 November, on emissions in livestock farming.

¹ 0.4% of the 12,000 milk farms, 0.47 of 21,000 fattening farms.

Thus, the draft does not provide for any actions with either a direct positive or negative gender impact. Therefore, initial inequalities are deemed not to exist with regard to equality of opportunity and treatment between women and men, and the draft does not provide for any change in this situation.

Ultimately, for the purposes of Article 26(3)(f) of Law 50/1997 of 27 November, of the Government, and Article 19 of Organic Law 3/2007 of 22 March, on effective equality between women and men, the draft has no gender impact.

5.5. Impact on the family.

The tenth additional provision of Law 40/2003 of 18 November, on the protection of large families requires analysis of the impact of the draft Regulation on families. It is not considered that any impact may be deduced from its contents in this regard, and therefore the impact on families should be classified as zero.

5.6. Impact on childhood and adolescence.

Pursuant to the provisions of Article 22(d) of Organic Law 1/1996 of 15 January, on the legal protection of minors, the partial amendment of the Civil Code and the Civil Procedure Act, as amended by Law 26/2015 of 28 July, amending the system for the protection of children and adolescents, it is necessary to analyse the impact of the Regulation on children and adolescents, the conclusion being that no such impact can be inferred from its contents and that the impact must therefore be classified as zero.

5.7. Environmental impact.

This Royal Decree has a positive environmental impact. It is a tool for assessing and reducing the environmental impact of livestock farming. It allows farms to register the Best Available Techniques (BAT) and estimate their greenhouse gas emissions, resource consumption and nitrogen and phosphorus excreta. By collecting this data, ECOGAN helps improve the environmental performance of the livestock sector and contributes to national emissions inventories. The data obtained in ECOGAN in the calculation of emissions in pigs show a considerable reduction in ammonia emissions. It is expected that its extension to other species will continue to improve the data.

5.8. Other impacts.

Finally, in accordance with Article 26(3) *in fine* of Law 50/1997 of 27 November, and Article 2(1)(g) of Royal Decree 931/2017 of 27 October, there are no impacts on equal opportunities, non-discrimination and universal accessibility for persons with disabilities;

VI. IMPACT DUE TO CLIMATE CHANGE.

The impact of this draft, in terms of mitigation and adaptation to climate change, in accordance with Article 26(3)(h) of the Government Law, is positive, as it makes it possible to measure GHG emissions in bovine farming and improving the calculation in porcine and avian farming.

VII. IMPACT IN THE AREA OF DIGITAL ADMINISTRATION.

In accordance with Article 2(1)(d)(2) of Royal Decree 931/2017 of 27 October, regulating the Regulatory Impact Analysis Report, the draft does not involve the development or use of the means and services of the Digital Administration, which could have an impact on citizens or on the Administration.

EX POST EVALUATION

Pursuant to the provisions of Article 28(2) of the Government Law, Articles 2(5) and 3 of Royal Decree 286/2017 of 24 March, regulating the Annual Regulatory Plan and the Annual Report on Regulatory Evaluation of the General State Administration and establishing the Regulatory Planning and Evaluation Board and Article 2(1)(j) of Royal Decree 931/2017 of 27 October, this Regulation is not considered to be subject to evaluation since none of the legally established assumptions for making such an evaluation mandatory are met, nor are there any other factors that would advise such an ex post evaluation.

Madrid, 5 December 2025.

ANNEX I

COMMENTS RECEIVED. PRIOR PUBLIC CONSULTATION.

Re: PUBLIC CONSULTATION PRIOR TO THE APPROVAL OF A ROYAL DECREE AMENDING ROYAL DECREE 988/2022, OF 29 NOVEMBER 2022, REGULATING THE GENERAL REGISTER OF BEST AVAILABLE TECHNIQUES ON LIVESTOCK HOLDINGS AND THE SUPPORT FOR THE CALCULATION, MONITORING AND NOTIFICATION OF EMISSIONS IN LIVESTOCK FARMING AND AMENDING VARIOUS AGRICULTURAL REGULATIONS.

(Format for sending observations or comments)

No	Author: name and address of the organisation/person, contact telephone and e-mail	Comment and Justification (*)	Alternative proposal	Assessment (to be completed by the Administration)
1	Unión de Uniones	<p>It is proposed to replace the term 'holding owner' with 'farm owner'.</p> <p>Justification</p> <p>Article 2(h) of Royal Decree 988/2022 defines "<i>Farm owner or holding owner</i>: Any natural or legal person who owns or is responsible for animals, even temporarily.". Therefore, the two terms are considered equivalent and, in order to simplify the regulations, avoid misinterpretation and promote a term that is more</p>	It is proposed to replace the term 'holding owner' with 'farm owner'.	Not accepted. As can be seen from the definitions, these are synonymous definitions that can be used interchangeably throughout the text

		consistent with the actual activity of a livestock farmer, which is to raise animals and not exploit them, it is proposed that this substitution be included.		
2	Unión de Uniones	In the cases described above, the process currently to be undertaken by the farm owner is to report BAT through another authorised technician. This process entails a double cost for the farms: that of the Environmental Control Entity and that of the technical service for communication. Following the demands for bureaucratic simplification from the entire agricultural sector and understanding that this case is easily resolved, it is proposed to include the proposed observation.	It is proposed to add a section to the articles referring to the obligations of owners and/or the communication of BATs, or in the form of an additional provision, with the following content: If, during an environmental inspection carried out by an Environmental Control Body, a BAT is observed which is not recorded in the register, it may be reported to the register by the same inspecting person in agreement with the farm owner.	Not accepted. Under no circumstances may an inspector carrying out an official check be authorised during an inspection to change the data recorded by the inspected person. This action would go against the principle of impartiality of the inspector. If, during an inspection, the inspector finds that a BAT is being applied and ECOGAN has not registered it correctly, the appropriate course of action would be to review the entire declara-

				tion to find where the error occurred and make a note of it.
3	ASOPROVAC		We recommend that the data requested be strictly limited to what is necessary to carry out the required calculations, avoiding unnecessary burdens. It is also essential that the information requested is presented in a clear, understandable and accessible manner, so that any farmer can easily understand what is being requested of them and how it should be provided.	This is a recommendation that is already being followed. ECOGAN requests only and exclusively the data necessary to record the BATs and make the emissions calculations. It is true that in the first declaration the data is numerous and the registration can be tedious, but they are essential to perform the calculations correctly. Most of these data do not have to be changed on an annual basis, so the administrative burden after that first declaration is very low or non-existent. The

				aim is also to ensure that the information requested is clearly defined and described, with examples to facilitate understanding.
4	ASOPROVAC		We suggest taking advantage of the modification to also link ECOGAN to Royal Decree 1051/2022 on sustainable soil nutrition; currently, ECOGAN performs the nutrient balances, but does not allow data matching with the nutritional balance requirements in crops.	This suggestion is already being implemented today. ECOGAN is a living tool that constantly includes new calculations and utilities. In particular, the calculation of the nitrogen balance has recently been included, as the difference between excreted and emitted nitrogen, which would be available for assessment.
6	CARGILL	Assessment by the Directorate-General for Agricultural Productions and Markets of the Ministry of Agriculture, Fisheries and Food and the Directorate-Gen-		Not accepted. The approval of a new BAT and its inclusion in the official list of BATs has its own ap-

		<p>eral for Quality and Environmental Assessment of the Ministry for the Ecological Transition and the Demographic Challenge of the available technical information submitted on SILVAIR® (ammonium calcium nitrate), for technical review and evaluation, and, where appropriate, approval and inclusion in the BAT2 group. To reduce methane emissions from enteric fermentation, as well as to update the REFERENCE LIST OF BEST AVAILABLE TECHNIQUES (BAT), through the corresponding Resolution of the Directorate-General for Agricultural Production and Markets of the Ministry of Agriculture, Fisheries and Food and the Directorate-General for Quality and Environmental Assessment of the Ministry for Ecological Transition and Demographic Challenge, so that it is included in the General Register of Best Available Techniques in farms and the support for the calculation, mon-</p>		<p>proval protocol, which does not consist of including it in this draft regulation.</p>
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		monitoring and reporting of emissions in livestock farming.		
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ANNEX II

Comments received at the hearing and public information on the draft Royal Decree amending Royal Decree 988/2022 of 29 November, regulating the General Register of the Best Available Techniques on Livestock Holdings and the support for the calculation, monitoring and notification of livestock emissions, and amending various agricultural rules.

No.	Article modified	Author	Comment and Justification	Alternative proposal	Assessment	Justification
1.	Sole article. One.	General Directorate of Agricultural Production and Livestock Production Animal Production and Health Services	The imposition of the obligation to communicate to ECOGAN on an annual basis instead of when there have been changes with respect to the data provided in previous communications, implies an in-	If the reason for the annual reporting obligation is due to the inclusion of new fields and the modification of some of the existing fields in the Register, it is pro-	Not accepted	The annual communication of data to ECOGAN is necessary and cannot be omitted due to several key reasons established in the regulations and technical criteria of the sector. The most relevant ones are included

		<p>vice. (Regional Ministry of Agriculture, Water, Livestock and Fisheries, Generalitat Valenciana)</p>	<p>crease in the obligations for the recipients and an increase in administrative burdens, which is contradictory to the provisions of Article 129 of Law 39/2015 of 1 October, on the Common Administrative Procedure of Public Administrations, to which reference is made at the end of the preamble of the draft Royal Decree. It would also mean an increase in the internal administrative burden for officials, who would have to notify and, where appropriate, review all communications annually. This is why it is stated that the obligation of an annual communication to ECOGAN should not be imposed for all holdings, this being mandatory only in livestock</p>	<p>posed that for farms not subject to IEA, the communication must be updated on a mandatory basis more frequently than annually, for example, every five years and in any case whenever there have been changes to the reported data.</p>	<p>below: It allows for the availability of up-to-date and reliable data on emissions and the implementation of best available techniques (BATs), essential for feeding the Spanish Emissions Inventory and complying with the international reporting commitments required annually (National Emissions Inventory, EMEP/EEA, IPCC) and facilitates the direct monitoring and evaluation of the annual evolution of emissions and the environmental impact of the sector, quickly detecting changes, trends or incidents that require intervention or improvement. Due to the experience gained in the years of application, they have shown that currently 30% of farms after mak-</p>
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			<p>holdings subject to Integrated Environmental Authorisation (IEA) in which, according to the provisions of its own regulations, it is necessary.</p> <p>All porcine farms (except for own consumption and reduced consumption) should be considered and poultry farms raising meat chickens, laying hens and turkeys (except for personal consumption, small-scale, game and special farms) must submit a declaration to ECOGAN. Requiring farms with very few LUs to submit their declaration to ECOGAN with the same annual frequency as farms with IEA is contradictory to the principle of proportionality.</p>		<p>ing a first declaration, do not make the declaration the following year again, so that what was expected to be exceptional has become routine.</p> <p>In addition to the need for periodic and immediate updating of ECOGAN's algorithms, subject to international directives and scientific advances, livestock activity is dynamic: animal censuses, facilities and techniques used change year after year, so a five-year communication would make the information incomplete, unrepresentative and of little use for administrative and sectoral decision-making.</p> <p>The annual nature guarantees transparency, traceability and effective control by the competent authorities, as well as fa-</p>
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					<p>ilitating planning and access to aid linked to the environmental performance and modernisation of the sector.</p> <p>For these reasons, the annual communication reinforces the adaptation to the European legal and environmental framework, the reliability in the national estimation of emissions and the defence of a sustainable and competitive livestock model in Spain.</p> <p>As regards the administrative burden for farm owners, it should be noted that the system preloads the previous year's declaration in draft form so that only what has changed on the farm is modified, so the additional burden is minimal.</p> <p>For the authorities of the Autonomous Communi-</p>
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						<p>ties it does not entail a greater administrative burden, since the volume of notifications is the same, regardless of whether or not the BAT declaration is submitted by the farm owner.</p> <p>As regards the observation of the lack of principle of proportionality, the legal basis exists both for farms with IEA (Law 16/2002 on integrated pollution prevention and control), and for farms that do not have IEA (Royal Decrees on sectoral management).</p>
2.	Single /Sub-section	ANPROGAPOR	<p>ANPROGAPOR opposes making a mandatory annual declaration.</p> <p>After several years making the declaration</p>	<p>Change: All owners of holdings covered by the scope of this Royal Decree must communicate, annually, and before 1 March at least,</p>	Not accepted	<p>See justification for Submission number 1</p> <p>In addition, with regard to the suggestion that the system automatically performs the calculations</p>

			<p>mandatory the first time and then voluntarily in the absence of major changes in the facilities, we have verified that the pig farming sector has continued to reduce its emissions year after year, as demonstrated by the reports published by MAPA.</p> <p>There is also the problem that the livestock farmer is not usually the one who makes the declaration, but rather an external agent (consultant, ADS, integrating company technician) who usually makes the declaration on behalf of the livestock farmers; the mandatory annual declaration would therefore represent an additional fixed cost for pig farms.</p>	<p>the mandatory data in Annex I.</p> <p>By: 'All the owners of the holdings covered by this Royal Decree will only have to make the declaration the first year before 1 March, after which it will only have to be amended in the event of substantial changes to the census or to the installation.</p>	<p>if the algorithms are modified, this is not considered viable, since the changes may be related to the inclusion of new techniques and new fields of the declaration; information that the MAPA does not have if it is not provided by the owners of the farms.</p>
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			<p>In the event that the application of ECOGAN undergoes internal changes to its algorithm, we request that with the same data provided by the farms in the first declaration, the MAPA itself carries out the necessary calculations again and that the livestock farmer be presented with a draft of how their new declaration would look with the changes introduced, so that it can continue to adjust the production of emissions at national level without the need to impose a cost on livestock farmers in terms of time and money.</p>			
3.	Article 1	CAE	Cooperativas Agro-alimentarias de España	Change: "All owners of hold-	Not accepted	See justification for Submission number 1

			<p>objects to the obligation to re-enter all information into ECOGAN annually when there have been no significant changes in the operation of farms or in the incorporation of new BATs. In fact, Royal Decree 306/2020 of 11 February 2020 laying down basic rules for the management of intensive porcine farms, and amending the basic rules for the management of extensive porcine farms states in Article 16(2) that the owners shall have the obligation to 'communicate to the competent authorities the Best Available Techniques applied in the holding at the time of entry into force of the obligation</p>	<p>ings covered by the scope of this Royal Decree will have to update, annually, and before 1 March at least, the mandatory data in Annex I. <u>By:</u> "All owners of holdings covered by the scope of this Royal Decree shall have to communicate, annually, and before the 1st of March each year, the mandatory data in Annex I that have undergone changes concerning the previous communication.</p>		
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			<p>laid down in Article 10(3). They shall subsequently submit annually, before 1 March of each year, a declaration of such techniques applied on their holding during the previous year, provided that the existing techniques have been modified or if new techniques have been incorporated, in accordance with the provisions of Articles 10 and 11, in a format to be determined by the competent authority of the Autonomous Community."</p> <p>This new obligation places a very significant administrative burden on operators and their associations, including cooperatives.</p>			
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			<p>There is no justification for establishing an annual periodicity when there are in fact no significant changes in the production model. If it is considered so essential to carry out this work, perhaps it would be beneficial for the central and regional administrations to have their own staff hired to carry it out, rather than passing this cost and work on to the operators and their associations.</p> <p>Agri-food Cooperatives of Spain believes that the current wording should be maintained or at most a period of five years should be established to make a complete declaration of the information of ECOGAN.</p>			
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4.	Article 1	UPA	<p>The ECOGAN tool has started to be used in the pig and poultry farming sectors and with this amendment to Royal Decree 988/2022 the bovine sector is included for the first time. We believe that the obligation should be limited to group IV of RD 1053/2022 on the organisation of bovine farms, as these are, due to their capacity, the farms with the greatest impact on the emission of pollutants and greenhouse gases.</p>	<p>Make the necessary regulatory amendments so that the communication obligation for bovine farms is for those included in group IV in Royal Decree 1053/2022 on the management of bovine holdings.</p>	Not accepted	<p>The universe of bovine farms subject to declaration in ECOGAN is not included or regulated in this Royal Decree but in Royal Decree 1053/2022. That is why that Submission falls outside the scope of this Royal Decree. However, it should be remembered that the obligation to declare BATs, in accordance with Royal Decree 1053/2022, is limited to farms in group IV and newly installed farms in group III.</p>
5.	Article 5	CAE	<p>Cooperativas Agro-alimentarias de España considers that the ECOGAN system should facilitate access to the application for technical teams in order to be</p>	<p>Include in Article 5. Farm owners may transfer the inclusion of information to ECOGAN to a third party by means of electronic authorisation or</p>	Not accepted	<p>The amendment is not considered necessary, since communication with the administrations by means of a representative is provided for in the current legislation and ECOGAN is already</p>

			<p>able to fill in the information of its members. Currently, the system that has been put in place is really complex as it requires authentication of the digital operator. We call for a simpler system to be put in place to authorise this inclusion of an owner's information by their association.</p>	<p>any other documentary means, written authorisation, without this exempting them from their responsibilities in accordance with the first subsection.</p>		<p>designed so that a third party can be authorised to submit the declaration.</p>
6.	Article 5.3	<p>Livestock service. Directorate-General (DG) of Agricultural Planning. Ministry of Agriculture, Livestock and Rural Development of Castilla La Mancha</p>	<p>We do not believe it is necessary to burden the sector with more bureaucracy, as it will not contribute anything new. Censuses change all year round, but livestock farms have a maximum capacity and based on that they will implement their emissions control and reduction methods; these methods will not change</p>	<p>Keep Article 5 as it is in the current Royal Decree, without modifying it</p>	Not accepted	<p>See justification for Submission number 1.</p> <p>Furthermore, attributing emissions on the basis of the maximum capacity of farms would lead to a less accurate emissions calculation system, since it would not be possible to carry out a real nutrient balance for each farm, which is the basis for the subsequent esti-</p>

			because one month they have 100 pigs and the second month they have 300 and the sixth month 350; if they have capacity of 400 pigs (for example) they will have control methods for these 400. In our view it places a new burden on the livestock farmer and the reality is that we do not think it will change the situation all that much.			mation of emissions. This Submission also overlooks the importance of having real information on feeding systems and animal yields, which are essential to achieving the objectives of the standard.
7.	Article 5(3)	Regional Ministry of Agriculture, Livestock and Rural Development, of the Regional Government of Castile and León	The new obligation for annual notification by all livestock farmers covered by the Royal Decree does not seem proportionate to us, given that: 1.This would imply a very significant increase in the number of notifications. We estimate that, for example, in the case of pig farming, this would mean an increase	Cancel the proposal to amend Article 5(3).	Not accepted	See justification for Submission number 1. With regard to Subsection 2 of this observation, it should be borne in mind that the requirements for which farms had to submit the declaration were laid down in the sectoral planning regulations (Royal Decrees 306/2020, 637/2021 and

		<p>of at least 60% in notifications in Castile and León, which would result in at least 1,500 more farms having to be notified.</p> <p>2.The number of holdings required to notify the BAT register under Spanish legislation far exceeds those required to do so under Community regulations. By way of example, in laying hens and in accordance with Community legislation, holdings with more than 256 LUs (40,000 places) must be notified, while in Spain this obligation is transferred to those with more than 55 LUs (8,593 places).</p> <p>3.The justification established in the preamble of the proposed amendment to the Royal Decree to require this annual notification</p>			<p>1053/2022) in order to achieve the national and international emissions reduction targets.</p>
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			<p>is based on the inclusion of new fields in ECOGAN, and/or the modification of some of them. It is true that the modifications made so far are intended to give greater reliability to the database and also to collect information whose objective is to reduce emissions from farms, but the reality is that the impact of these reductions on global emission volumes does not seem to justify requiring all farms to report annually. Because it is another thing entirely whether an individual farm finds it worthwhile to make the new declaration to reduce emissions, but it already has this possibility with the old wording.</p> <p>4. Most farmers delegate the task of making this</p>			
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		<p>notification to a third party (companies, unions, integrators etc.), which generates a cost for them. It is true that the application makes it easier by making it possible to duplicate past declarations and only amend what has changed, but it is also true that the formalities are not straightforward, since it is not the farmer who makes the notification.</p> <p>5.The penalty system for failure to notify ECOGAN establishes repeated infringement as a very serious infringement, which not only entails fines of over EUR 20,000, but also the possibility of an ancillary penalty of the reduction of CAP aid in the following two financial years.</p>			
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			6.- And almost as important as the rest of the arguments, the reduction of bureaucracy in the livestock sector should be a priority of agricultural policy.			
8.	Article 5(3)	Directorate-General for Agriculture, Livestock and Rural Development Regional Ministry of Agriculture, Fisheries and the Natural Environment of the Government of the Balearic Islands	It indicates that they will have to carry out the communication annually. We understand that the annual communication will be based on the data declared in the previous year and, if necessary, you may modify the corresponding data.		Not applicable	This is not a Submission, but rather a comment. This is how the ECOGAN tool already works. The declaration is made based on the draft submitted in the declaration of the previous year.
9.	Article 5(3)	UPA (Unión de Pequeños Agricultores y Ganaderos) [Union of Small Farmers	We are against the change in Article 5(3), which requires communications to be made annually, regardless of whether or not there	Maintain the previous wording of Article 5(3): 5.3. All owners of holdings covered by the scope of this	Not accepted	See justification for Submission number 1. In addition, in the specific case of cattle, the number of farms that

		and Ranchers]	<p>have been changes in the holding compared to the previous year.</p> <p>This amendment will add bureaucratic burdens to farms and increase their operating costs, without us being able to understand what use there is in making communications every year if nothing has changed on the farms.</p> <p>The excessive bureaucracy to which farmers in general, and livestock farmers in particular, are subjected has been and continues to be one of the main complaints of producers and, among many other aspects, has been part of the recent demands and protests by this group. We consider that this annual obligation does</p>	<p>Royal Decree shall have to communicate, annually, and before 1 March, the mandatory data in Annex I that have undergone changes since the previous communication.</p>		<p>have to submit the declaration is small, but criteria other than those applied to other sectors cannot be applied, as the commitment to reduce emissions is applicable to the entire livestock sector.</p>
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			<p>not contribute to simplifying the lives of livestock farmers and we do not see the benefit for the monitoring of BATs that this can bring.</p> <p>Finally, since the proposal includes the bovine sector for the first time, we would like to point out that dairy farms are very stable in terms of herd size, so we do not see the annual communication as appropriate (except in the case of modification, which is how it is contemplated in the current text).</p>			
10.	Article 7	Department of Agriculture, Livestock, Fisheries and Food, Generalitat de Catalunya	<p>Article 7 Conditions regarding location and sanitary separation.</p> <p>A) Sanitary separation: It is proposed to add a new Subsection 7, with the following wording: <i>"7. By way of exception,</i></p>	<p>Justification: in many livestock areas with a high concentration of pigs, it is necessary to implement measures that allow for proper environ-</p>	Not accepted	<p>This is a proposed amendment to Royal Decree 306/2020, not the one which is amended in this proposed regulation. This falls outside the scope of this Royal Decree.</p>

			<p><i>the installation of SANDACH plants may be authorised by reducing the distance provided for in Annex V to this Royal Decree, provided that, in the opinion of the competent authority of the Autonomous Community, both on the farms and in the plants, biosecurity measures are adequately reinforced to guarantee animal health criteria in accordance with current legislation”.</i></p>	<p>mental management of farms. One of the measures implemented for this purpose is the management of excrement by plants that can treat it (which, as a minimum, have the status of Category 2 Sandach plants). The installation of this type of facility is usually carried out for its energy, functional and economic sustainability, close to where livestock excrement is generated, i.e. close to porcine farms. Although it is clear that there is a certain health risk due to the proximity of the treatment plants to the farms, it is also</p>		
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				<p>true that there has been a great evolution by the plants in the systems of transport, collection, storage, treatment and management of waste and leachate, which allows, at the discretion of the competent health authority of the Autonomous Region, additional biosecurity criteria to be applied to ensure the animal health of the animals present on the farms while the distance criteria can be relaxed. This way the sustainability of the pig farming sector can be guaranteed, especially in areas with a high live-</p>	
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				stock density.		
11.	Article 9	Department of Agriculture, Livestock, Fisheries and Food, Generalitat de Catalunya	The provisions of this Article shall apply to all pig farms, including those existing at the entry into force of this Royal Decree. 1. Porcine farms must have sealed and naturally or artificially impermeable manure ponds to prevent the risk of seepage and the contamination of surface and groundwater, ensuring that losses due to overflow, seepage or geotechnical instability are prevented, with the precise size necessary to store production for at least three months, allowing proper management of the manure in accordance with the manure production and management plan included in the Integrated Farm Management Sys-	The following wording is proposed: <i>"1. Porcine farms must have sealed and naturally or artificially impermeable manure ponds, to prevent the risk of seepage and contamination of surface and groundwater, ensuring that losses due to overflow, seepage or geotechnical instability are prevented, allowing proper management of the manure in accordance with the manure production and management plan included in the Integrated Farm Management System. In the case of</i>	Not accepted	This is proposed amendment to Royal Decree 306/2020 not the content of this regulation.

			<p>tem. To calculate the volume of the pond, the values set out in Annex IV, any other equivalent tool or direct or indirect measuring instrument, or any criterion or value authorised by the competent authority may be used.</p>	<p><i>farms with a capacity greater than 120 GMU, they must have the precise size to be able to store production for at least three months.</i> To calculate the volume of the pond, the values set out in Annex IV, any other equivalent tool or direct or indirect measuring instrument, or any criterion or value authorised by the competent authority may be used".</p> <p>Justification: Article 10(2) of the same Royal Decree 306/2020 establishes a criterion of flexibility regarding the adoption of emissions reduction measures for</p>	
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				existing porcine farms with a capacity equal to or less than 120 LUs. Consequently, we propose to establish a flexibility criterion for the minimum capacity of the storage systems for swine excrement for this type of farm (≤ 120 LU), given that the number of animals present in them (being a maximum of 1,000 fattening pigs), can allow for the management of the excrement without having to have storage systems with dimensions that practically never reach their maximum capacity potential.		
12.	Article 10	Maite Martín /	It should be a manda-	Add to the text:	Not ac-	The quality and reliability

		<p>President One Health Platform</p>	<p>tory requirement that annual reports reflecting the evolution of emissions from each of the livestock sectors incorporate data quality indicators. This would ensure the reliability of the data, improve transparency and credibility, and allow for the identification of areas for improvement. This would comply with the provisions of section c) of article 1 of this Royal Decree.</p>	<p><i>'The Directorate-General for Agricultural Production and Markets shall issue an annual report, reflecting the implementation of BATs and their evolution in each of the livestock sectors included in the scope of application of this Royal Decree, based on the annual information submitted by the competent authorities of the Autonomous Communities. This report should incorporate data quality indicators with the aim of ensuring data reliability, improving transparency and credibility, and identifying areas for improvement'.</i></p>	<p>cepted</p>	<p>of the data is guaranteed by the verifications carried out by the competent authorities of the autonomous communities within the framework of official controls to verify compliance with the environmental requirements of the farms, which are provided for in the royal decrees on livestock management.</p> <p>On the other hand, the information contained in the BAT reports drawn up by the Directorate-General for Agricultural Production and Markets is transmitted to the Spanish inventory system, which is subject to periodic audits by different international bodies, ensuring the quality and consistency of the information contained in these reports.</p>
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13.	Article 10	Maite Martín / President One Health Platform	<p>The information contained in these reports should be presented in a way that is understandable and easily accessible to all citizens. In this sense, publishing a simple table on the website with data broken down by autonomous communities—reflecting progress in emissions reduction and livestock sustainability by region—would not only contribute to improving institutional transparency and strengthening public trust in environmental policies, but could also act as an incentive for the autonomous communities themselves to intensify their efforts towards more sustainable livestock farming.</p>	<p><i>Add a Point 3 to Article 10 stating: “With the purpose of strengthening institutional transparency and improving the accessibility of information by citizens, the publication of the annual reports will be complemented with a structured data table available on the official web platform. This table will present information broken down by autonomous community, reflecting the progress made in reducing emissions and implementing sustainable livestock farming practices, with the aim of facilitating public understanding and</i></p>	Not accepted	<p>General considerations are not the subject of this Royal Decree; however, current reports published on the MAPA website already provide this information. They have gradually improved and expanded their content. The level of disaggregation requested is already included in the annual reports. In 2025, an interactive report in Power BI format has been made available to the public so that users can obtain the information of their interest in the form of graphs or data tables.</p>
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				<i>promoting interregional comparability."</i>		
14.	Article 10, Subsection 1	COAG - Coordinator of Farmers' and Livestock Breeders' Organizations	At COAG we are committed to complying with the emissions reduction programmes established by the regulations governing the various livestock sectors, to promote the improvement of the environmental performance of livestock holdings, as well as to monitor developments in the situation, to demonstrate progress in reducing pollution and combating climate change, and to corroborate the degree of compliance with the international environmental and climate agreements concluded by the Kingdom of Spain, as established in the preamble to Royal Decree 988/2022.	Amend the wording: The Directorate-General for Agricultural Productions and Markets shall issue an annual report, reflecting the evolution of emissions, as well as the implementation of BATs and their evolution in each one of the livestock sectors falling within the scope of this Royal Decree, based on the annual information submitted by the competent authorities of the Autonomous Communities and on the data of the Spanish Emissions Inventory	Not accepted	<p>The DGPMA already publishes the report on BATs on an annual basis, as it is a matter within its competence.</p> <p>This does not apply to emissions that fall within the remit of the MITERD, which is responsible for publishing an annual report setting out the contribution of the livestock sector in terms of emissions, within the National Emissions Inventory of the Spanish Inventory System.</p> <p>The information collected in ECOGAN represents a high percentage of the livestock population of different species (pigs and poultry). However, in order to know the evolu-</p>

		<p>We therefore believe it is essential to maintain the text of the current Royal Decree, as well as for the Directorate-General for Agricultural Productions and Markets to comply with it by issuing the annual report reflecting the evolution of emissions from each of the livestock sectors included in the scope of application of the Royal Decree.</p> <p>In order to be able to comply with our national emissions reduction commitment, we believe that, apart from the information on the implementation of BATs and their evolution in each of the livestock sectors (also interesting information), it is still necessary to know what the real impact of this implementation is on</p>	<p>System, as provided for in Royal Decree 818/2018 of 6 July."</p>		<p>tion of livestock emissions it is necessary to refer to the Spanish Emissions Inventory System (SEI), which includes the estimation of emissions from censuses not declared in ECOGAN and that of other livestock species.</p> <p>Therefore, it is the SEI report that takes into account the information from ECOGAN and not the other way round, so it is considered that this observation should not be accepted.</p>
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		<p>the calculation of the emissions generated by each of the sectors. These types of reports are necessary tools to detect possible deviations.</p> <p>So much so that the legislation itself (Article 18(5)(d) of Royal Decree 360/2020 or Article 11(3) of Royal Decree 1053/2022, for example) proposes the possible review and adoption of additional emissions reduction measures if the annual reports suggest a deviation from the reduction targets or emissions limits set for Spain and even the review of the average size of the farms affected by these requirements. If there are no reports showing the evolution of emissions by sector, it will be impossible to de-</p>			
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			tect possible deviations and adopt corrective measures aimed at fulfilling our environmental commitments.			
15.	Article 12 1	Fondo Galego de garantía agraria (Galician Agricultural Guarantee Fund)	Section 1 of Article 12 is amended to read as follows: "1. In the event of non-compliance with the provisions of this Royal Decree, the rules on infringements and penalties applicable in accordance with the consolidated text of the Law on Integrated Pollution Prevention and Control, approved by Royal Legislative Decree 1/2016 of 16 December, and Law 34/2007 of 15 November, on air quality and protection of the atmosphere, shall apply." May also be considered: "1. <i>In the event of non-compliance with the</i>	It is proposed to maintain the current wording of Article 12(1), limiting the sanctioning regime to that established in Royal Legislative Decree 1/2016, and Law 34/2007 since EU regulations (Regulation 2024/1244 and Industrial Emissions Directive) only require the collection and reporting of environmental data, without automatic linkage to the CAP conditionality. In this way, the European obligation	Not accepted	Reference must be made to Law 30/2022 because Title III specifically regulates the sanctioning regime in related agricultural matters. In particular, Article 28 establishes the sanctioning regime in relation to the register of BATs

			<p><i>provisions of this Royal Decree, the rules on infringements and penalties shall apply in accordance with the provisions of the consolidated text of the Law on Integrated Pollution Prevention and Control, approved by Royal Legislative Decree 1/2016 of 16 December, Law 34/2007 of 15 November, on air quality and protection of the atmosphere, and Law 30/2022 of 23 December, regulating the management system for the Common Agricultural Policy and other related matters.'</i></p>	<p>to ensure environmental compliance is fulfilled, the double sanction is avoided, and the principle of administrative simplification—demanded by both the sector and the Commission itself in the review of the CAP—is taken into account.</p>		
16.	Article 13 *	Maite Martín / President One Health Platform	<p>This Royal Decree does not provide for the granting of specific incentives to those livestock farms that implement Best Available Techniques (BATs) with a</p>	<p>Incorporate Article 13. (in Royal Decree 988/2022): <i>'Measures to promote the implementation of BATs and the reduction</i></p>	Not accepted	<p>The Royal Decree has a specific and delimited regulatory character, focused on establishing the ECOGAN computerised system, its operation, communication and</p>

			<p>greater positive environmental impact, nor to those that apply for registration of their carbon footprint in the Carbon Footprint, Offsetting and Carbon Dioxide Absorption Projects Register. Although it is not possible at this stage to define the type of incentives or bonuses that could be established, it is considered appropriate to open the possibility of considering measures that promote the adoption of sustainable practices by farms</p>	<p><i>of emissions, which shall indicate: With the aim of encouraging livestock farms that implement Best Available Techniques (BATs) with a greater positive environmental impact, a set of measures will be established to recognize and promote these practices. These measures may include bonuses, preferential access to sectoral support programmes, and other mechanisms that help accelerate the transition to more sustainable and environmentally efficient production models”.</i></p>	<p>coordination obligations between administrations, without entering into sectoral policies of promotion or economic incentives, which correspond to other regulatory and strategic planning areas.</p> <p>Measures of recognition, bonuses or preferential access to sectoral support programs constitute public policy instruments that require complex and specific administrative procedures, outside the technical-statutory scope of a Royal Decree that only guides the technical and documentary management of the tool.</p> <p>Including incentive provisions in the Royal Decree would create rigidity in adapting to changes in public policies or sectoral</p>
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					<p>priorities, which must have the flexibility to respond to variable economic and environmental contexts through different regulations or decrees or sectoral plans.</p> <p>The regulation of incentives must be based on participatory processes and economic, social and environmental assessments that deserve to be sufficiently developed in specific regulatory and strategic frameworks, thus guaranteeing legal transparency and administrative efficiency.</p> <p>Therefore, the best practice is for the Royal Decree to focus on ensuring a robust, homogeneous and reliable computerised system for the management and calculation of emissions</p>
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						through ECOGAN, while incentives and promotional measures are developed in other regulations or plans that can be complemented, updated and applied with greater flexibility and strategic focus.
17.	Fourth final provision, Subsection 2(f)	DANONE	In the analysis of the draft regulation, we have identified various aspects of the proposed approach that, with appropriate adjustments, could significantly contribute to improving its practical applicability and its positive impact on the sector. In particular, we would like to raise a technical and operational concern regarding the requirement to report environmental information by housing, as set out on page 32 of the draft. If the definition estab-	Explicitly define what is meant by "certain types of bovine farms" in the regulatory text, limiting the reporting obligation to newly established Group III bovine farms and existing Group IV farms, in accordance with Article 11 of Royal Decree 1053/2022. • Replace the reporting approach based on housing with a reporting approach based on farm level, espe-	Not accepted	The bovine farms to which the Royal Decree applies are listed in article 1 of Royal Decree 988/2022, so it is not considered necessary to include this clarification in the text. ECOGAN is a system that makes it possible to record the Best Available Techniques (BATs) applied to each farm housing, as well as to estimate pollutant emissions and resource consumption in each production unit throughout the livestock farming process.

		<p>lished by Royal Decree 988/2022 - that is, 'housing' being understood as the place of the livestock holding, installation or part of the installation where animals are kept, bred or handled - is maintained, this would imply that bovine holdings must report individualised information for each housing unit within the same holding.</p> <p>We understand that, as a result of Article 11 of Royal Decree 1053/2022, only newly established group III bovine holdings and existing group IV bovine holdings — in accordance with the provisions of the fourth final provision, Subsection 2(f) of that Royal Decree — are obliged to adopt techniques aimed at</p>	<p>cially in the case of bovine farms, to ensure the technical and administrative feasibility of compliance.</p>	<p>This precision is essential to reflect differences in handling, species, category, and specific conditions, ensuring reliable and useful data for environmental management and regulatory compliance.</p> <p>Although completion by housing involves a level of detail that could be perceived as a bureaucratic burden, ECOGAN is designing to minimise that burden through digital management, which avoids duplication and allows timely updates only when changes occur. This makes the system efficient and manageable for livestock farmers, especially for technologically advanced holdings, without compromising the quality of the information.</p>
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		<p>mitigating emissions of polluting and greenhouse gases. Therefore, it seems logical to interpret that only these farms should be subject to the obligation to report BATs. Following this reasoning, given the high number of animals handled by farms in this arrangement, it is very complex to break down precisely the information required in Annex I for each of these housings, especially as regards energy consumption, emissions, manure management or resource use. In this regard, although this requirement is understandable from a technical point of view, it presents significant practical difficulties, especially on large farms, which usually have a</p>		<p>As regards the consumption of water, energy and electricity, as well as the production of manure, it is assessed jointly for the whole farm insofar as it is taken into account that it cannot be broken down by housing.</p>
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			large number of housing units.			
18.	Sole final provision	UPA	Bovine animals are included in the declaration obligation and we believe that they need a longer period of adaptation and should be accompanied by adequate training from the Ministry's technical services.	The adaptation period, in the case of newly incorporated bovine animals, should be assessed and discussed with the sector itself through the corresponding sectoral tables of the meat and milk bovine sectors.	Not accepted	Since the publication of Royal Decree 1053/2022, the sector has known that the first declaration should be made in ECOGAN in 2026. Furthermore, very few farms are affected by this requirement and training courses are being carried out.
19.	Annex I Section 1, 2 and 3. Subsection A	General Directorate of Environmental Quality, Ministry of Sustainable Development. Castile-La Mancha	In Subsection (d), where it indicates " <i>Year of the last farm reform involving alteration of the environmental impact</i> ".	Perhaps it would be better to point out " <i>Year of the last reform that required undergoing the environmental assessment procedure</i> "	Not accepted	The reform carried out on a livestock holding does not have to be due solely to the Submission to an environmental assessment procedure, but may be associated simply with an improvement in the efficiency or sustainability of the production system.
20.	Annex I Section 1 and 2 Subsection A	General Directorate of Environmental Quality, Min-	In Subsection (l) of Section 1 Porcine and Section 2 Avian, where it states 'Availability of In-	Perhaps it would be better to indicate "Year of the last substantial modifi-	Not accepted	The last substantial modification of the facility may not be associated with environmental rea-

		istry of Sustainable Development. Castile-La Mancha	egrated Environmental Authorisation. Year of last revision of Integrated Environmental Authorisation',	cation of the facility".		sons related to the granting of the Integrated Environmental Authorisation.
21.	Annexes I and II. Section 3	CAE	Cooperativas Agroalimentarias de España are opposed to requesting all this productive and environmental information from the bovine sector, since there is no regulatory justification or protection that requires it. In addition, it entails a very high additional administrative and economic burden, as has been demonstrated in the other affected sectors, for the operators of holdings and their organisations. Furthermore, it is not in line with the message conveyed by the Ministry of Agriculture, Fisheries	Removal of the Sections 3 of Annexes I and II of the proposal	Not accepted	The development of ECOGAN for cattle is necessary and justified for the following reasons: Regulatory compliance: complies with the provisions of Royal Decree 1053/2022, Royal Decree 988/2022 and the obligations arising from European regulations regarding compliance with emissions ceilings. As established in Article 1 of Royal Decree 988/2022, it applies to all livestock farms that have the obligation to apply and communicate the implementation of BATs to the general register. In the case of cattle, this requirement is established in Ar-

		<p>and Food to reduce bureaucracy.</p> <p>Cooperativas Agro-alimentarias de España, as regards the bovine sector, the provisions of Royal Decree 1053/2022 of 27 December, establishing basic rules for the management of bovine farms are sufficient legal basis for the Autonomous Communities to obtain and collect, exclusively, information on the implementation of the Best Available Techniques in livestock farms. In any case, if the Ministry of Agriculture, Fisheries and Food deems it necessary, the mechanism should be established by which the Autonomous Communities transfer this information to the Ministry, not adding a more</p>		<p>article 11 of Royal Decree 1053/2022.</p> <p>Need for reliable data: ECOGAN Vacuno will allow audited information to be reported to the Spanish Emissions Inventory System on the emissions of the bovine sector, which is one of the main emitters of polluting gases and greenhouse gases. This assessment is independent of any decisions that may be taken in the review of Directive 2010/75/EC on industrial emissions, scheduled for before 31 December 2026.</p> <p>As for the bureaucratic burden, see justification for Submission 1.</p>
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			<p>bureaucratic burden to the operators.</p> <p>From a legislative point of view, we have not found a basis, either community or state, on which this regulation can establish this new obligation to collect such exhaustive information as is included in this Royal Decree.</p> <p>The preamble to the regulation states that:</p> <p><i>'At present, the annexes to the aforementioned Royal Decree lay down the basic data to be communicated by the farms corresponding to the porcine and avian species, which were those that had at the time of entry into force of the Royal Decree the obligation to communicate the corresponding</i></p>			
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		<p><i>information to the Register, in application of the livestock management regulations. With the publication and entry into force of Royal Decree 1053/2022, of 27 December, establishing basic rules for the management of bovine farms, this obligation also extends to certain types of bovine farms. It is therefore necessary to amend the annexes accordingly, to include the information concerning this species”.</i></p> <p>However, Royal Decree 1053/2022 of 27 December, establishing basic rules for the management of bovine farms only establishes that the obligation of the owners of the farms is to apply and communicate the Best Available Techniques applied,</p>			
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		<p>see Articles 11 and 17 of the Royal Decree, in no case data for the calculation of emissions of these farms.</p> <p><i>“Article 11. Reduction of farm emissions.</i></p> <p><i>1. New group III and existing group IV bovine holdings in accordance with the fourth final provision, Subsection (2)(f), shall adopt techniques, as set out in the following subsection, for the purpose of mitigating emissions of gaseous pollutants and greenhouse gases into the atmosphere. These techniques shall be included in the reference list drawn up by the Ministry of Agriculture, Fisheries and Food and the Ministry for Ecological Transition and the Demographic Chal-</i></p>			
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		<p><i>lenge, which shall be published on the websites of said Ministries before 31 December 2023. This list, based on document “ECE/EB.AIR/120: Guidance document on the prevention and reduction of ammonia emissions from agricultural sources, as well as the document ECE/EB.AIR/149: Guidance document on integrated sustainable nitrogen management, will be updated in line with advances in scientific knowledge.</i></p> <p><i>“Article 17(2). Obligations of owners of bovine holdings.</i></p> <p><i>2. Communicate, in accordance with the fourth final provision, Subsection (2)(g), to the competent authorities the techniques applied</i></p>			
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			<p><i>on the holding pursuant to Article 11. They shall subsequently submit annually, before 1 March of each year, a declaration of such techniques applied on their holding during the previous year, provided that the existing techniques have been modified or if new techniques have been incorporated, in a format to be determined by the competent authority of the Autonomous Community".</i></p> <p>On the other hand, the preamble also points out that the modification of this rule is to comply with the obligation to notify environmental data within the scope of Regulation 2024/1244.</p> <p><i>'In addition, in order to ensure the proper</i></p>			
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		<p> <i>implementation in Spain of the new provisions introduced by Regulation (EU) 2024/1244 of the European Parliament and of the Council of 24 April 2024 on the reporting of environmental data from industrial installations, establishing an Industrial Emissions Portal and repealing Regulation (EC) 166/2006, it is necessary to adapt the contents of the annexes to Royal Decree 988/2022 of 29 November. This is done, for example, by expanding the lists corresponding to the types of fuels used on the farm."</i> </p> <p> In this regard, it is important to recall that Regulation (EU) 2024/1244 of the European Parliament and of the Council of 24 April </p>			
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			<p>2024 on the reporting of environmental data from industrial installations and establishing an Industrial Emissions Portal, sets out in Article 3 and in the Annex the definition of installations falling within its scope:</p> <p><i>“Article 3. Definitions</i></p> <p><i>‘installation’: a stationary technical unit where one or more of the activities listed in Annex I are carried out, as well as any other activities on the same site directly associated with those activities which have a technical connection with the activities listed in that Annex and which may have an impact on emissions and pollution.”</i></p> <p><i>“Annex I. Activities</i></p> <ul style="list-style-type: none"> • <i>Activities</i> 			
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			<p><i>listed in Annex I of Directive 2010/75/EU</i></p> <ul style="list-style-type: none"> • <i>Activities listed in Annex I bis of Directive 2010/75/EU"</i> <p>Since the bovine sector has not been included in the scope of this Directive, Member States would also not have the obligation to report environmental data from these farms.</p> <p>We are also concerned that the inclusion of the bovine sector in this legislation would imply the recognition that this sector should be included within the scope of Directive 2010/75/EU of the European Parliament and of the Council of 24 November 2010, on industrial emissions and emissions from livestock farming (integrated pollution preven-</p>			
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			tion and control), since we would be assimilating in terms of the application of Best Available Techniques and declaration of emissions data with pigs and poultry farming.			
22.	Annex I Minimum data contained in the General Register of the Best Available Techniques on Livestock Holdings applied on the holding	Directorate-General for Agriculture, Livestock and Rural Development Regional Ministry of Agriculture, Fisheries and the Natural Environment of the Government of the Balearic Islands	The wording of the second paragraph of Annex I of the draft Royal Decree implies that all farms that are not required to be in PRTR must report a limited set of data to the General Register of Best Available Techniques. There are some types of farms that are not required to report to ECOGAN. Example: small-scale, self-consumption, special or game avian farms are not required to report to ECOGAN	Holders whose livestock holdings are required to report to ECOGAN, and are not affected by the recast text of the Integrated Pollution Prevention and Control Act, shall communicate the information contained in Subsections A, B, C, D and E. Communication of the information marked with (*) in the preceding subsections, as well as the information contained in subsections F	Accepted	The Annex to the Royal Decree is amended to clarify the following text <i>“Holders obliged to communicate to the General Register of Best Available Techniques whose livestock holdings are affected by the recast text of the Law on Integrated Pollution Prevention and Control, approved by Royal Legislative Decree 1/2016, of 16 December, shall communicate the information contained in all subsections of this Annex.</i> <i>Holders obliged to communicate to the General</i>

				and G, shall be voluntary.		<i>Register of Best Available Techniques whose livestock holdings are not affected by the recast text of the Law on Integrated Pollution Prevention and Control, approved by Royal Legislative Decree 1/2016, of 16 December, must communicate the information contained in sections A, B, C, D and E. The communication of the information marked with (*) in the previous subsections, as well as the information contained in Subsections F, G and H shall be voluntary."</i>
23.	In ANNEX I (Minimum data contained in the General Register of the Best Available Tech-	Regional Government of Galicia. Regional Ministry of Rural Affairs	Point 1 d) says: " <i>(d) Floor type of housing: fully slatted. Partially slatted, solid impermeable floor with heated bedding, solid impermeable slatted or channelled floor with regular</i>	Therefore, we believe the new text should read: <i>d) Floor type of housing: partially slatted (provided that the resting area is free</i>	Accepted	Compatibility between environmental and animal welfare regulations regarding the floor type of housing can be achieved through a joint and complementary interpretation of both, tak-

	<p>niques on Livestock applied on the holding) SECTION 3. (BOVINE SPECIES), Part B (RELATIVE TO PARTICULAR INFORMATION ON THE ENVIRONMENTAL CHARACTERISTICS OF THE HOLDING), point (1)</p>		<p><i>cleaning of floors using scrapers (or other automatic systems, such as robots or manual systems), convex floor and separate water and slurry channels with partially slatted floor, combination of water and slurry channels with fully slatted floor, and others."</i> However, Royal Decree 1053/2022 of 27 December 2022 laying down basic rules for the management of bovine farms (Official State Gazette No 312 of 29/12/2022) provides in Article 7(1)(a): "In the case of animals staying at any time or production stage in permanent facilities, they must have a place to lie on a uniform floor, with a comfortable, clean and dry bed, in order to</p>	<p><i>from it and as far away as possible from it), solid impermeable floor with heated bedding, solid impermeable slatted or channelled floor with regular cleaning of floors using scrapers (or other automatic systems such as robots or manual systems), convex floor and separate water and slurry channels with partially slatted floor, combination of water and slurry channels with fully slatted floor and others.</i></p>	<p>ing into account the following: Both regulations agree in classifying the type of floor in the same categories: fully slatted, partially slatted, solid impermeable floor with heated bedding, slatted or channelled floor with regular cleaning of floors, convex floor with water and slurry channels, combinations of channels and lattice floors, and other types. However, Royal Decree 1053/2022 (animal welfare regulations) establishes an important additional requirement for bovine farms: that animals have a resting place with uniform floor, comfortable, clean and dry bed, to ensure maximum welfare and reduce</p>
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			<p>ensure maximum welfare and reduce the risk of accidents and diseases. <i>Animals must not be kept in a space entirely covered with grating. So the rest area should at least be free from it and as far away from it as possible.</i>"</p>		<p>the risk of diseases. It is also prohibited that the entire surface be covered in slatting: at least the resting area should be free of it and as far away as possible.</p> <p>This requirement does not contradict environmental regulations, but rather complements the classification of the soil with a criterion of well-being during rest. This implies that the design and management of the housing must simultaneously take into account the technical criteria for environmental management (type of soil for handling and emission, according to ECOGAN and related) and animal welfare (adequate rest area differentiated from the slatted floor).</p>
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						<p>In practice, this compatibility means that, in order to comply with both regulations, the housing must have differentiated surfaces that allow adequate environmental management (cleaning, handling of manure and slurry, emissions reduction) and, at the same time, satisfy the welfare needs of animals with comfortable, dry and clean rest areas, following the indications of Royal Decree 1053/2022.</p> <p>This integrated approach should be reflected in ECOGAN registers and descriptions and animal welfare documents, ensuring that housing is designed and managed to meet both objectives in a harmonised and efficient manner.</p>
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					<p>In summary, it is possible to make both regulations compatible considering that the type of soil is interpreted taking into account not only the environmental classification, but also the appropriate conditions for animal welfare, which implies a spatial differentiation within the housing and a coordinated management that allows compliance with the current technical and ethical requirements.</p> <p>Paragraph d) is worded as follows: "<i>d) Floor type of housing:</i> <i>The floor categories considered are: fully slatted, partially slatted, solid impermeable floor with heated bedding, solid impermeable slatted or channelled floor with regular cleaning by</i></p>
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					<p><i>scrapers or other automatic or manual systems, convex floor with separate water and slurry channels with partially slatted floor, combination of water and slurry channels with fully slatted floor, and other compatible types.</i></p> <p><i>However, in order to ensure simultaneous compliance with animal welfare in accordance with Royal Decree 1053/2022 of 27 December, permanent facilities in which animals remain at any stage of production must have a resting area that is separate from the rest of the floor, characterised by a uniform floor, a comfortable, clean and dry bed, free of slatted flooring and located as far away as possible from slatted sur-</i></p>
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						<i>faces, in order to ensure maximum comfort and reduce the risk of accidents and diseases".</i>
24.	Subsection (I) of the annex to the draft	Directorate-General for Agriculture, Livestock and Rural Development Regional Ministry of Agriculture, Fisheries and the Natural Environment of the Government of the Balearic Islands	"(I) <i>Availability of simplified Environmental Impact Assessment. Year of last revision of the simplified Environmental Impact Assessment.</i> " They do not cover holdings requiring an ordinary Environmental Impact Assessment.	"(I) <i>Availability of ordinary or simplified Environmental Impact Assessment. Year of last review of the ordinary or simplified Environmental Impact Assessment</i> "	Accepted	In order to avoid future changes in criteria, the following wording is included: " <i>Availability of Environmental Impact Assessment required by regulations.</i> "
25.	Annex I. Minimum data (second paragraph)	Regional Ministry of Agriculture, Livestock and Rural Development, of the Regional Government of Castile and	It is not clear who is obliged to complete Subsection H for cattle, since, although it appears with an asterisk (*), Subsection H is not included in the text at the beginning of Annex I, which defines who	Correctly define who is obliged to declare Subsection H of Section 3, at the beginning of Annex I, including the letter H in the text if applicable.	Accepted	The wording has been amended to clarify that the information contained in Subsection H is voluntary for all species. Subsection H is also included for the rest of the species where this information is also voluntary.

		León	must complete each section and for whom it is voluntary.			
26.	Annex I Section 1.A. (e)	Department of Agriculture, Livestock, Fisheries and Food, Generalitat de Catalunya	It is necessary to define the different possibilities referred to in the phrase: <i>"Farm activity during the reporting year."</i>		Accepted	The following options are included in Annex I, section 1.Ae) for greater clarity: <i>"Yes, my farm has been active, even if only for one day during the year covered by the declaration/No, my farm has not been active on any day during the year covered by the declaration."</i>
27.	Annex I Section 1.A. f) (same as Sections 2 and 3)	Department of Agriculture, Livestock, Fisheries and Food, Generalitat de Catalunya	This data does not correspond to the census data that must be declared in accordance with the various sectoral planning regulations (an "average occupancy census" is not declared). In the case of bovine animals, the census data are also permanently updated. It can cause confusion. In addition, the specific	Delete	Not accepted	The number of places occupied constitutes data of vital importance in order to make as accurate a calculation possible of the emissions of each farm. This is the data that is incorporated into the emissions calculation system developed by MITERD in order to take into account the ECOGAN data in the Spanish Inventory System.

			data of the places occupied are also declared later to be able to make the calculations of the emissions that are generated.			
28.	Annex I Section 1.A. g) (same as Sections 2 and 3)	Department of Agriculture, Livestock, Fisheries and Food, Generalitat de Catalunya	This system must be in place, because it is part of the IFMS (RD 344/2025). If it is declared that it is not, it must be requested and the appropriate measures must be taken. Points (g), (h) (i) and (j) correspond to IFMS requirements that are not requested to be reported in other registers (e.g. REGA), even if they are covered by sectoral planning regulations (i.e. they are requirements to be complied with, but are not recorded in an administrative register). It should be remem-	Delete	Not accepted	The request for this specific data is due to the fact that it corresponds to BAT 1 included in Commission Decision 302/2017 as mandatory information to be declared by those farms that are included in the scope of the Industrial Emissions Directive. However, this data is accompanied by an asterisk, which indicates that it corresponds to data to be declared voluntarily.

			<p>bered that sectoral regulations already stipulate that farm owners must have the Integrated Farm Management System, duly updated, available to the competent authority for supervision and control purposes.</p> <p>Establishing an element of operator self-control in an element to be declared directly in a Register contradicts the purpose of the IFMS.</p>			
29.	Annex I Section 1.A. h) (same as Sections 2 and 3)	Department of Agriculture, Livestock, Fisheries and Food, Generalitat de Catalunya	Same as the previous case, but in addition, the Livestock Manure Management Plan is a prerequisite for processing an RER, that is, if there is no PGDG the farm should not be active.	Delete	Not accepted	The request for this specific data is due to the fact that it corresponds to BAT 1 included in Commission Decision 302/2017 as mandatory information to be declared by those farms that are included in the scope of the Industrial Emissions Directive.

						However, this data is accompanied by an asterisk, which indicates that it corresponds to data to be declared voluntarily.
30.	Annex I Section 1.A. i) (same as Sections 2 and 3)	Department of Agriculture, Livestock, Fisheries and Food, Generalitat de Catalunya	Same as the previous case	Delete	Not accepted	The request for this specific data is due to its correspondence with BAT 2 c) of Commission Decision 302/2017: Establish an emergency plan to deal with unforeseen emissions and incidents, such as the contamination of water bodies. This technique may include the following: - a plan of the farm showing the drainage systems and the sources of water and effluent, - action plans to react to certain unforeseen events (e.g. fires, leakage or collapse of slurry tanks, uncontrolled runoff from dung heaps, fuel spills),

						<p>- availability of equipment to deal with a pollution incident (e.g. equipment to unclog drainage pipes or drains, reservoir pits, containment barriers to prevent fuel leakage, etc.)</p> <p>However, this data is accompanied by an asterisk, which indicates that it corresponds to data to be declared voluntarily.</p>
31.	Annex I Section 1.A. j) (same as Sections 2 and 3)	Department of Agriculture, Livestock, Fisheries and Food, Generalitat de Catalunya	This subsection may cause confusion, because the management of corpses is carried out more for health reasons than for environmental reasons, and although they are related, there may be elements that are not assessed in the same way. Article 37 of Law 8/2003 (Animal Health) already provides that <i>“any activity of animal exploitation shall be</i>	Delete	Not accepted	The request for this specific data is due to the fact that it corresponds to BAT 2 (e) of Commission Decision 302/2017: Store dead animals in such a way as to prevent or reduce emissions. The text specifies <i>“If you have a Corpse Maintenance and Management Plan. Indicate whether dead animals are stored in such a way as to prevent or reduce emis-</i>

			<i>subject to the hygienic disposal of effluents, exploitation by-products, special treatment residues and carcasses, in accordance with the rules of animal health, public health and environmental protection".</i>			sions". It is therefore not about compliance for health reasons, but rather of checking compliance with BAT 2. However, this data is accompanied by an asterisk, which indicates that it corresponds to data to be declared voluntarily.
32.	Annex I Section 1.A. (k)(i) (same as Sections 2 and 3)	Department of Agriculture, Livestock, Fisheries and Food, Generalitat de Catalunya	Do they have to declare that they comply with the regulatory distances? They are supposed to do so if they are registered, authorised, and operating. Otherwise, the activity cannot be authorised.	Delete	Not accepted	The request for this specific data is due to the fact that it corresponds to BAT 2 defined in Decision 302/2017, making no reference to compliance with health requirements that are outside the scope of this Royal Decree.
33.	Annex I Section 1.A. (k)(ii) (same as Sections 2 and 3)	Department of Agriculture, Livestock, Fisheries and Food, Generalitat de Catalunya	In relation to environmental issues, or all the training elements established by the different regulations? It is a requirement in terms of IFMS that is not re-	Delete	Not accepted	The request for these specific data is due to the fact that it corresponds to BAT2, BAT 10 and BAT 13. In other words, this is not

			<p>requested to be reported in other registers (for example, in REGA), even if they are covered by sectoral planning regulations (that is, they are requirements to be complied with, but they are not recorded in an administrative register).</p>			<p>a question concerning the IFMS but to determine the proper implementation of BAT 2, BAT 10 and BAT 13 included in Decision 302/2017.</p>
34.	Annex I Section 1, 2 and 3. Subsection F, sub-Subsection 2	General Directorate of Environmental Quality, Ministry of Sustainable Development. Castile-La Mancha	<p>In Subsection F Energy consumption and use, in Subsection 2 Fuel consumption in the installation, biogas or biomass are declared, which are renewable energies. It's fine to declare it, but it doesn't seem reasonable to then say in the FAQ that renewable energies should not be declared.</p>	Modify the FAQs of the Ministry of Agriculture.	Not accepted	<p>In relation to the calculation of the carbon footprint of the activity, it is important to clarify the differential treatment that is carried out with respect to the renewable energy produced on-site compared to the renewable energy consumed from outside sources.</p> <p>In accordance with internationally recognised methodologies (such as the GHG Protocol) and the official guidelines of the Ministry for the Eco-</p>

					<p>logical Transition and the Demographic Challenge (MITERD), the carbon footprint is calculated taking into account the emissions associated with the energy consumed in the activity, also differentiating between direct and indirect emissions (mainly Scopes 1 and 2).</p> <p>Renewable energy generated by an installation for self-consumption (for example, through its own solar panels) is not included in the carbon footprint because such generation does not involve associated emissions from external processes. In other words, that energy is considered to be produced without emitting greenhouse gases and does not generate a carbon footprint,</p>
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					<p>so it should not be counted as consumption with emissions. Obviously, this own production results in less energy consumption from outside sources.</p> <p>Conversely, renewable energy that is acquired and consumed from outside the facility must be included in the calculation, since, although it is renewable, its generation and distribution have an environmental impact that is reflected in an emission factor incorporated into the energy mix. Furthermore, this accounting ensures traceability, transparency and avoids double counting of emissions, which is fundamental for the integrity and consistency of the footprint.</p>
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						<p>This criterion allows for a faithful reflection of the real environmental impact of the activity, avoiding overestimation or underestimation of emissions and complying with the legal and methodological requirements in force in Spain, especially in accordance with Royal Decree 214/2025 on the Carbon Footprint Registry and reduction plans.</p> <p>In conclusion, not declaring self-produced renewable energy and declaring externally consumed renewable energy is a methodologically sound practice to ensure accuracy, transparency and avoid duplication in the accounting of greenhouse gas emissions.</p>
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						However, the BAT on energy saving does require this information, so it is recorded, but it is not counted for the purpose of the carbon footprint.
35.	Annex I Section 1, 2 and 3. Subsection F, sub-Subsection 4	General Directorate of Environmental Quality, Ministry of Sustainable Development. Castile-La Mancha	In Subsection F: "Energy Consumption and Use", in Subsection 4: "Electricity consumption at the facility": the requirement to declare the percentage of renewable energy consumption has been removed. Instead, the form asks whether renewable energy is produced and consumed on the farm, but does not ask about the amount of such energy produced/consumed separately from the overall consumption.	Ask a question about: -Renewable energy produced at the facility -Renewable energy consumed in the installation originating from the installation itself	Not accepted	See justification for Submission number 34.
36.	Annex I Section 1.B.1	Department of Agriculture,	The unit of time to determine the length of		Accepted	The unit of time for length of stay has been

	f) ii	Livestock, Fisheries and Food, Generalitat de Catalunya	stay is not determined			included in Annex I.B) 1(f)(ii). This refers to the length of stay in days.
37.	Annex I Section 1.B.2 b) v	Department of Agriculture, Livestock, Fisheries and Food, Generalitat de Catalunya	The unit of time to determine the length of stay is not determined		Accepted	The unit of time for length of stay has been included in Annex I. B) 2. b) v.
38.	Annex I Section 1.B.2 b) xiii	Department of Agriculture, Livestock, Fisheries and Food, Generalitat de Catalunya	The solid-liquid separation carried out in the external storage of slurry is not listed as a treatment	Note as a slurry treatment the mechanical separation of the slurry into solid fraction and liquid fraction, especially if this is carried out from a collection pond of all the slurry storage facilities on the holding	Not accepted	This section covers the treatments applicable to slurry for the reduction of emissions. The solid-liquid separation, based on the UNECE guide and the provisions of Commission Decision 302/2017, corresponds to an on-site processing of manure that facilitates its management and the subsequent treatment of both solid and liquid fractions, although it is a technique that does not intrinsically reduce emis-

						sions.
39.	Annex I Section 1.B.2 b) xiii	Department of Agriculture, Livestock, Fisheries and Food, General- itat de Catalunya	Include in the treat- ments solar drying (de- hydration), gas washing (stripping absorption) and membrane separa- tions		Not ac- cepted	Currently these tech- niques are not recog- nised at the community level as BATs and are not included in the UNECE International Guide or in Decision 302/2017, so it is not possible at the mo- ment to include them in the BAT Register.
40.	Annex I Section 1.B.3 b) iv	Department of Agriculture, Livestock, Fisheries and Food, General- itat de Catalunya	Why is it only necessary to declare the distance to watercourses in the case of solid manure storage facilities, when they have to have a leachate collection sys- tem?		Not ac- cepted	Based on the provisions of Commission Decision 302/2017, with regard to BAT 15 e), it is necessary to ask this question to those farms that store solid manure in piles in the field, in which case it could only be done: 1) if they do so far from surface or underground watercourses where run- off could occur. 2) If solid manure is piled directly onto the ground in the field before being spread over a limited pe- riod of time (e.g. a few

						days or several weeks). 3)If the storage site changes at least once a year and must be located as far away from surface water and groundwater as possible to avoid contamination run-off.
41.	Annex I Section 1.B.3) b x/ xi	Department of Agriculture, Livestock, Fisheries and Food, General- itat de Catalunya	Why is there a difference between walls that allow increasing the height of the manure pile and the manure heap/pile that has concrete walls?	To be amended to: a) <i>It has walls</i> b) <i>What construction material is used?</i>	Partly accepted	The text has been adapted The subsection has been restructured. x. "If the manure/stack has walls that allow the height of the heap of manure to be increased". And subsection xi is deleted.
42.	Annex I Section 1.B.3) b xv	Department of Agriculture, Livestock, Fisheries and Food, General- itat de Catalunya	How do you determine if the external storage system has sufficient capacity to store the manure for sufficient time until it can be used in the field?	State whether you have the months of storage required by state or regional regulations	Not accepted	This provision is included in the corresponding regulations for each livestock species. Example: In the case of intensive pigs, Article 9(1) of Royal Decree 306/2020 provides: " <i>Porcine farms must have manure</i>

						<p><i>ponds that are fenced and waterproofed, naturally or artificially, to prevent the risk of seepage and contamination of surface and groundwater, ensuring that losses due to overflow, seepage or geotechnical instability are prevented, with the precise size to be able to store the production of at least three months, allowing the proper management of the same in accordance with the manure production and management plan included in the Integrated Farm Management System. To calculate the volume of the storage system, the values set out in Annex IV, any other equivalent tool or direct or indirect measuring instrument, or any criterion or value authorised by the competent</i></p>
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						<i>authority may be used"</i>
43.	Annex I Section 1.B.3 c)	Department of Agriculture, Livestock, Fisheries and Food, General- itat de Catalunya	Specify the difference between composting and aerobic digestion of solid waste.	Aerobic digestion is not necessary since composting is already an aerobic digestion for the solid fractions.	Not ac- cepted	<p>The difference between composting and aerobic digestion of solid waste lies mainly in the biological processes and environmental conditions under which the organic matter decomposes.</p> <p>Composting is a controlled biological process of aerobic decomposition (with oxygen) of organic matter, including solid manure, which produces compost.</p> <p>Composting involves the action of aerobic microorganisms that transform organic matter into more stable products such as humus, releasing water vapour and carbon dioxide (CO₂).</p> <p>The process is usually divided into phases: prepa-</p>

					<p>ration and conditioning, mesophilic decomposition (low to medium temperatures), thermophilic decomposition (high temperatures, up to 70°C), and maturation or cooling, where the compost is stabilised and microbial activity decreases.</p> <p>The resulting compost is a stable product, with less odour, suitable for use as an organic soil amendment and improves soil structure.</p> <p>Aerobic digestion, strictly speaking, is also a biological process of decomposition with oxygen, but it tends to be used to describe the rapid and controlled transformation of organic matter, with a greater focus on the reduction of solids and the</p>
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					<p>production of a stable product in a shorter time.</p> <p>It is continuously supplied with oxygen, consumes energy for aeration, and is suitable for certain organic waste with high moisture content. It produces CO₂ and water and generates compost as a by-product.</p> <p>Compared to anaerobic processes, it does not produce methane (CH₄) and is less technically complex.</p> <p>Although they are similar, in practice aerobic digestion can refer to more industrial or rapid treatment systems compared to traditional composting, which can sometimes be slower and more manual.</p>
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						In short, composting is a type of aerobic digestion with well-defined and controlled processes to transform manure into useful compost, while aerobic digestion may refer to a more general process of biological decomposition with oxygen, which includes composting but may encompass more accelerated or technically advanced methods.
44.	Annex I Section 1.B.3 (c)	Department of Agriculture, Livestock, Fisheries and Food, Generalitat de Catalunya	Treatment of manure: The additive is not a treatment in itself, but rather part of a treatment. Nitrification/de-nitrification treatment is not used in solid waste. It would be interesting to incorporate the treatment of solar dehydration.		Not accepted	Currently, none of these techniques are recognised internationally in the UNECE Guide or at the community level as BATs, and they are not included in Commission Decision 302/2017, so it is not possible to include them in the BAT Register at this time.
45.	Annex I Section 1.C	Department of Agriculture,	PRODUCTION AND FOOD DATA: These data		Not accepted	Productive data, such as animal growth and mor-

	(same as Sections 2 and 3)	Livestock, Fisheries and Food, Generalitat de Catalunya	(although they must be included in the IFMS in the protocols, and in their corresponding records) is not information that is collected for registration in REGA, and many of them are not even required as data to be kept as part of the farm records. This information must therefore be declared for the purposes of that registration. It is important because it is a source of information that the Administration will have, and that should in principle coincide with the information that the farm has in its internal records (e.g. % mortality, % abortions, types of feed, etc.). And monitor whether there is data that is already declared in other Registers.		<p>tality, together with feeding information, are key to determining the emissions on farms for several reasons:</p> <p>Methane, the main greenhouse gas emitted by livestock, is primarily generated by enteric fermentation in ruminants. The amount of methane depends directly on the growth rate and the type of feed, since more fibrous or poorly balanced diets increase fermentation and emissions. Mortality influences the age and productivity of livestock, affecting global emissions.</p> <p>The quality and quantity of food ingested influence digestion and the excretion of nitrogen, which can be transformed into ammonia</p>
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					<p>and polluting nitrogen oxides. Therefore, a good understanding of nutrition is essential to calculate emissions and evaluate improvements.</p> <p>Growth and productivity rates condition feed efficiency and the volume of manure generated; fundamental parameters for accurately estimating emissions of polluting gases. Greater growth can translate into fewer cumulative emissions per animal.</p> <p>Standard methodologies, such as those of the IPCC, use these data to calculate emissions in national inventories, and tools such as ECOGAN collect this information to obtain estimates tailored to each farm, improving the effectiveness</p>
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						of abatement measures. In short, without reliable data on growth, mortality and feeding, the calculation of emissions would be inaccurate, hindering environmental management and the implementation of effective strategies to mitigate the impact of livestock farming. Unfortunately, this information is not found in any existing record, so its inclusion in ECOGAN is necessary.
46.	Annex I Section 1.C.2.d).iii	Department of Agriculture, Livestock, Fisheries and Food, Generalitat de Catalunya	For the information on the feed supplied by type of animal, it is indicated that estimated data are used.	In Catalonia, the production of nitrogen generated in livestock farming is obtained using the Balance of Nitrogen on the Farm (BNG) tool. This tool uses real data from feed delivery notes that can be supplied by the farmer or the	Not accepted	A comparison is made between the BNG, which is the methodology established in Order ARP/225/2019 for the calculation of nitrogen from livestock manure from pig farming in Catalonia, and the ECOGAN computerised system developed by the Ministry of Agriculture, Fisheries and

				<p>feed factory/integrator. We believe that the use of real data makes the final nitrogen and phosphorus generation results more reliable and robust, as they are calculated at the level of the farm as a whole.</p>	<p>Food (MAPA), highlighting the limitations of the first method in relation to the international coverage and requirements that ECOGAN complies with:</p> <p>It is considered necessary to state the methodological limitations of Order ARP/225/2019</p> <p>Restrictive scope: The Order focuses its application exclusively on porcine farms in Catalonia, not covering other relevant livestock species that contribute to the total nitrogen cycle and its emissions.</p> <p>Simplified and declarative methodology: Its calculation is based on the volumetric balance of nitrogen excreted during a</p>
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					<p>specific annual period, using data not provided by the user and focused on animal categories and feeding, limiting the accuracy and truthfulness of the inventory.</p> <p>Lack of integration of gaseous emissions: The Order does not consider or calculate the direct and indirect emissions of ammonia (NH₃), nitrous oxide (N₂O) and other nitrogenous gases, which have a high environmental and climate impact. This omission makes the balance incomplete from the point of view of international guidelines.</p> <p>Lack of connection with national and international inventories: It does not comply with the official greenhouse gas inventory systems (IPCC,</p>
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						<p>EMEP/EEA) nor with the requirements of European legislation on the control of air pollutants from livestock farming.</p> <p>Temporal, spatial and technical modelling limitations of nitrogen flows: The reference period and the variables considered do not reflect the complexity and variability of the nitrogen cycle, nor do they include environmental transformations or losses due to leaching, volatilisation, and other processes.</p> <p>Technical advantages of ECOGAN:</p> <p>Comprehensive and multidisciplinary coverage: ECOGAN covers multiple livestock species and types of farms, integrating production data,</p>
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						<p>feeding, manure management and applied techniques.</p> <p>Complete and standardised modelling: Calculate total nitrogen inputs and outputs, including relevant gaseous emissions (NH₃, N₂O, NO_x), leachates, and other flows that allow for real balances.</p> <p>Compliance with international standards: ECOGAN's methodology is aligned with current international and European directives, forming the Spanish Inventory System, essential to meet climate and environmental commitments.</p> <p>Mandatory and audited IT tool: It guarantees traceability, integrity and homogeneity of data, fa-</p>
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						<p>ilitating regulatory control, environmental planning and scientific research.</p> <p>Conclusion: The methodology proposed in Order ARP/225/2019 is insufficient to develop a complete nitrogen balance adjusted to international standards due to its limited, simplified and partial approach, as well as not taking into account critical environmental emissions. In contrast, ECOGAN offers a comprehensive, robust and regulatory aligned solution suitable for sustainable agricultural management, environmental regulation and international reporting.</p>
47.	Annex I Section 1.D.2	Department of Agriculture,	Solid-liquid separation from external storage is	Include solid-liquid separation as a	Not accepted	See justification for Submission number 38

		Livestock, Fisheries and Food, Generalitat de Catalunya	not considered a treatment.	treatment for waste.		
48.	Annex I Section 1.E.2	Department of Agriculture, Livestock, Fisheries and Food, Generalitat de Catalunya	<p>If you perform a prior solid-liquid separation treatment prior to accumulation in the external slurry storage system:</p> <p>Percentage of solid fraction handled after solid-liquid separation treatment</p> <p>Percentage of liquid fraction handled after solid-liquid separation treatment</p> <p>1) The liquid solid separation would have to be included in the treatment subsection when it is carried out from the external storage.</p> <p>2) According to the structure of the document, in subsections D (storage and manage-</p>		Not accepted	See justification for Submission number 38

			ment of liquid manure) and E (storage and management of solid manure), the solid-liquid separation performance data must be repeated.			
49.	Annex I - SECTION 2: POULTRY SECTOR	COAG	"3. <i>All owners of holdings covered by the scope of this Royal Decree will have to update, annually, and before 1 March at least, the mandatory data in Annex I.</i> "	We request that there be only one record for all these data. We understand that it is necessary for farms to update and communicate these data, but it is necessary to simplify all the mandatory records that currently exist to a single record, where this information appears and can be automatically transferred between the different records. In other words farmers do not have to complete separate	Not accepted	The use of the ECOGAN computer tool is, precisely, a fundamental integrating system that allows maintaining technical precision and efficiency in environmental management, while facilitating administrative simplification and reducing bureaucratic burdens for farm owners. -Comprehensive functionality of ECOGAN: The application collects comprehensive information on management, feeding, categories and numbers of animals, storage systems and agricultural use of slur-

				<p>ECOGAN, manure declaration, IFMS, SGA, etc. systems. This greatly complicates the management of the farms and increases the bureaucracy, when the general objective of the administration is the simplification of bureaucracy.</p>	<p>ries and manures, thus integrating the data necessary to comply with multiple environmental reporting obligations.</p> <p>-Advantages of adopting ECOGAN as a single registry:</p> <p>a) Significant reduction of bureaucracy: By allowing the centralisation and homogenisation of data, ECOGAN prevents farmers from having to fill out multiple forms or keep parallel records for different bodies or regulations.</p> <p>b) Automated integration with other systems: Administrations can automatically transfer information from ECOGAN to other registries (Manure declaration,</p>
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						<p>environmental registries, IFMS, PRTR), ensuring consistency and avoiding human errors or data losses.</p> <p>c) Regulatory compliance and traceability: ECOGAN is aligned with national and European legislation, ensuring that the data submitted corresponds to technical quality standards and can be audited or used for monitoring and control.</p> <p>d) Support for environmental action: Beyond mere administrative compliance, ECOGAN acts as a management tool that allows farmers to understand their real situation, adopt improvements and evaluate the impact of their practices, pro-</p>
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						<p>motoring more sustainable production.</p> <p><u>Conclusion</u></p> <p>Although simplifying the administrative burden is a shared and priority objective, the only way to guarantee technical accuracy, regulatory integration and environmental improvement in livestock farms is through the use and enhancement of systems such as ECOGAN. Its implementation as a single registry facilitates information management for producers and authorities, while promoting the effective reduction of polluting emissions and the protection of the environment.</p>
50.	Annex I SECTION 2.	General Directorate of Agri-	Cage system. "In laying birds indicate the colour	There are times when there are two	Accepted	The option 'Other' is included, although this re-

	AVIAN SPECIES, Subsection B.1.d.(i)	cultural Production and Livestock Production Animal Production and Health Service. (Regional Ministry of Agriculture, Water, Livestock and Fisheries, Generalitat Valenciana)	of the animals (blonde/white) and whether moulting takes place (in laying birds only). <i>In the case of moulting, indicate the day of the production cycle on which the change starts and duration in days</i>	colours of hens in the same shed, including black. Therefore, there should be the possibility of specifying several colours or indicating the predominant colour.		sponse does not actually have any impact on the calculation of emissions or on compliance with BATs, being purely technical information for a better characterisation of the sector.
51.	Annex I Section 2.A.e)	Department of Agriculture, Livestock, Fisheries and Food, Generalitat de Catalunya	It is necessary to define the different possibilities referred to in the phrase: Farm activity during the reporting year		Accepted	See justification for Submission number 26.
52.	Annex I Section 2.B.1 f)	Department of Agriculture, Livestock, Fisheries and Food, Generalitat de Catalunya	The unit of time to determine the length of stay is not determined		Accepted	See justification for Submission number 36.

53.	Annex I Section 2.B.2 b) v	Department of Agriculture, Livestock, Fisheries and Food, General- itat de Catalunya	Why is it only necessary to declare the distance to watercourses in the case of solid manure storage facilities, when they have to have a leachate collection sys- tem?		Not ac- cepted	See justification for Sub- mission number 40.
54.	Annex I Section 2.B.2) bx/ xi	Department of Agriculture, Livestock, Fisheries and Food, General- itat de Catalunya	Because there is a dif- ference between walls that allow the height of the manure heap to be increased and manure heaps/piles that have concrete walls.	To be amended to: c) It has walls d) what construc- tion is material used?	Partly ac- cepted	See justification for Sub- mission number 41.
55.	Annex I Section 2.B.2) b xv	Department of Agriculture, Livestock, Fisheries and Food, General- itat de Catalunya	How do you determine if the external storage system has sufficient capacity to store the manure for sufficient time until it can be used in the field.	Declare whether you have the months of storage required by state or regional regula- tions	Not ac- cepted	This provision is included in the corresponding reg- ulations for each live- stock species. Example: In the case of intensive pig farming, Article 9 of Royal Decree 637/2021, Subsection 1 Porcine farms must have fenced and waterproofed ma- nure ponds, either natu- ral or artificial, that pre- vent the risk of leakage and contamination of

						surface and groundwater, ensuring that losses due to overflow, leakage or geotechnical instability are prevented, with the necessary size to store at least three months' production, allowing for their proper management in accordance with the manure production and management plan included in the Comprehensive Farm Management System. To calculate the volume of the storage system, the values set out in Annex IV, any other equivalent tool or direct or indirect measuring instrument, or any criterion or value authorised by the competent authority may be used
56.	Annex I Section 2.B.2 c)	Department of Agriculture, Livestock, Fisheries and	Specify the difference between composting and aerobic digestion in solid waste.	Aerobic digestion is not necessary, as composting is already an aerobic	Not accepted	See justification for Submission number 43.

		Food, Generalitat de Catalunya		digestion process for solid fractions		
57.	Annex I Section 2.B.2 c)	Department of Agriculture, Livestock, Fisheries and Food, Generalitat de Catalunya	Treatment of manure: The additive is not a treatment in itself, but rather part of a treatment. Nitrification/de-nitrification treatment is not used in solid waste. It would be interesting to incorporate the treatment of solar dehydration.		Not accepted	See justification for Submission number 44.
58.	Annex I Section 2.B.2 c)	Department of Agriculture, Livestock, Fisheries and Food, Generalitat de Catalunya	Specify the difference between composting and aerobic digestion	Aerobic digestion is not necessary since composting is already an aerobic digestion for the solid fractions.	Not accepted	See justification for Submission number 43.
59.	Annex I Section 2.B.2 c)	Department of Agriculture, Livestock, Fisheries and Food, Generalitat de Catalunya	Treatment of manure: The additive is not a treatment in itself, but rather part of a treatment. Nitrification/de-nitrification treatment is not used in solid waste.		Not accepted	See justification for Submission number 44.

			It would be interesting to incorporate the treatment of solar dehydration.			
60.	Annex I SECTION 2. AVIAN SPECIES, Subsection C.1.e) and h)	General Directorate of Agricultural Production and Livestock Production Animal Production and Health Service. (Regional Ministry of Agriculture, Water, Livestock and Fisheries, Generalitat Valenciana)	"e) <i>In laying birds: In the case of moulting, indicate the day of the production cycle on which the change starts and the duration in days.</i> h) <i>In laying birds:</i> i. <i>Average mass of eggs per animal (g eggs/day) during the first and second moulting cycle</i> ii. <i>Weight at the beginning and end of the moulting cycle</i> "	With regard to "moulting", although this concept is not explicitly prohibited in the regulations, this handling practice may imply a breach of animal welfare regulations due to unnecessary suffering, hunger and/or prolonged thirst. It is considered that a definition should be established in accordance with animal welfare regulations.	Not accepted	At present, since there is no express prohibition, it remains an option in the declaration, although the implementation of this technique may be non-existent or very limited.
61.	Annex I Section 2.C.2	Department of Agriculture, Livestock, Fisheries and Food, Generalitat de	For the information on the feed supplied by type of animal, it is indicated that estimated data are used. To what extent can estimated		Not accepted	See justification for Submission number 46. However, the Farm Nitrogen Balance (FNB) tool in the case of poultry farm-

		Catalunya	data be accepted?			ing is not regulated in Catalonia.
62.	Annex I Section 2.D.2	Department of Agriculture, Livestock, Fisheries and Food, Generalitat de Catalunya	Solid-liquid separation from external storage is not considered a treatment.	Include solid-liquid separation as a treatment for waste.	Not accepted	See justification for Submission number 38.
63.	Annex I Section 2.E.2	Department of Agriculture, Livestock, Fisheries and Food, Generalitat de Catalunya	If you perform a prior solid-liquid separation treatment prior to accumulation in the external slurry storage system: Percentage of solid fraction handled after solid-liquid separation treatment Percentage of liquid fraction handled after solid-liquid separation treatment 1) The liquid solid separation would have to be included in the treatment subsection when it is carried out from the ex-		Not accepted	See justification for Submission number 38.

			<p>ternal storage.</p> <p>2) According to the structure of the document, in subsections D (storage and management of liquid manure) and E (storage and management of solid manure), the solid-liquid separation performance data must be repeated.</p>			
64.	Annex I SECTION 2. AVIAN SPECIES, Subsection F. 6)	General Directorate of Agricultural Production and Livestock Production Animal Production and Health Service. (Regional Ministry of Agriculture, Water, Livestock and Fisheries, General-	F. 6):" Indicate the marketing company"	The obligation to provide this data is not justified from the point of view of emissions. It has been verified that the option to indicate the percentage of consumption of renewable energy, which could at least be maintained as optional and also specify	Not accepted	The marketing company corresponds to a key data point to be able to determine the carbon footprint, since each marketing company has an emission coefficient and an associated footprint that is fundamental to obtaining this calculation. These coefficients are provided by the Spanish Office for Climate Change and included within the ECO-

		itat Valenciana)		"estimated percentage of renewable energy consumption"		GAN calculation system. For more information on the use of renewable energy, see the response to Submission number 34.
65.	Annex I Section 3.A.e)	Department of Agriculture, Livestock, Fisheries and Food, Generalitat de Catalunya	It is necessary to define the different possibilities referred to in the phrase: " <i>Farm activity during the reporting year</i> "		Accepted	See justification for Submission number 26.
66.	Annex I SECTION 3. BOVINE SPECIES A.g)	General Directorate of Agricultural Production and Livestock Production and Animal Production and Health Service. (Regional Ministry of Agriculture, Water, Livestock and Fish-	g): " <i>If there is an Environmental Management System, including a Noise Management Plan and an Odour Management Plan, and whether it periodically monitors air odour emissions and uses any technique to prevent or reduce noise emissions (*)</i> ."	The phrase " <i>if it periodically monitors odour emissions into the air</i> " is subjective. Since it is neither measurable nor quantifiable, it is considered that it should be eliminated.	Not accepted	In Decision 302/2017, BAT 26, which consists of periodically monitoring odour emissions into the air, establishes that odour emissions can be monitored by: <ul style="list-style-type: none"> • EN standards (e.g. dynamic olfactometry according to EN 13725 to determine odour concentration). • When alternative methods are applied for

		eries, Generalitat Valenciana)				which EN standards are not available (e.g. estimation/measurement of odour exposure, estimation of its impact), ISO standards, national standards or other standardised international standards that guarantee the obtaining of data of equivalent scientific quality may be applied.
67.	Annex I Section 3.B.1.h)	Department of Agriculture, Livestock, Fisheries and Food, Generalitat de Catalunya	The unit of time to determine the length of stay is not determined		Accepted	See justification for Submission number 36.
68.	Annex I Section 3.B.2 b)	Department of Agriculture, Livestock, Fisheries and Food, Generalitat de Catalunya	The solid-liquid separation carried out in the external storage of slurry is not listed as a treatment	Record as a slurry treatment the mechanical separation of slurry into solid and liquid fractions, especially if this is done from a collection pond for	Not accepted	See justification for Submission number 38

				all the slurry storage facilities on the farm.		
69.	Annex I Section 3.B.2 b)	Department of Agriculture, Livestock, Fisheries and Food, Generalitat de Catalunya	Specify the difference between composting and aerobic digestion	Aerobic digestion is not necessary since composting is already an aerobic digestion for the solid fractions.	Not accepted	See justification for Submission number 43.
70.	Annex I Section 3.B.2 c)	Department of Agriculture, Livestock, Fisheries and Food, Generalitat de Catalunya	Specify the difference between composting and aerobic digestion of solid waste.	Aerobic digestion is not necessary since composting is already an aerobic digestion for the solid fractions.	Not accepted	See justification for Submission number 43.
71.	Annex I Section 3.B.2 c)	Department of Agriculture, Livestock, Fisheries and Food, Generalitat de Catalunya	Treatment of manure: The additive is not a treatment in itself, but rather part of a treatment. Nitrification/de-nitrification treatment is not used in solid waste. It would be interesting to incorporate the treatment of solar dehydration.		Not accepted	See justification for Submission number 44.
72.	Annex I	Department of	Why is it only necessary		Not ac-	See justification for Sub-

	Section 3.B.3 b) iv	Agriculture, Livestock, Fisheries and Food, Generalitat de Catalunya	to declare the distance to watercourses in the case of solid manure storage facilities, when they have to have a leachate collection system?		cepted	mission number 40
73.	Annex I Section 3.B.3) b xv	Department of Agriculture, Livestock, Fisheries and Food, Generalitat de Catalunya	How do you determine if the external storage system has sufficient capacity to store the manure for sufficient time until it can be used in the field?	Declare whether you have the months of storage required by state or regional regulations	Not accepted	See justification for Submission numbers 42 and 55.
74.	Annex I Section 3.B.3 c)	Department of Agriculture, Livestock, Fisheries and Food, Generalitat de Catalunya	Treatment of manure: The additive is not a treatment in itself, but rather part of a treatment. Nitrification/denitrification treatment is not used in solid waste. It would be interesting to incorporate the treatment of solar dehydration.		Not accepted	See justification for Submission number 44.
75.	ANNEX I Section 3. C. PRODUC-	Consejo General de Colegios de la Pro-	We believe that production indices should not be taken into account.		Not accepted	Productivity indices are essential to correctly calculate emissions and the

	<p>TION AND FOOD DATA 1) h)</p>	<p>fesión Veterinaria de España y Ilustre Colegio oficial de Veterinarios de la Región de Murcia (General Council of Associations of the Veterinary Profession of Spain and the Official Association of Veterinarians of the Region of Murcia)</p>	<p>The different climatic conditions of our geography greatly influence the productive indices, regardless of the management carried out by the farmers. It should be borne in mind that from 22°C and 45% relative humidity (conditions that in many regions occur for more than 6 months per year) the dairy cow is considered to be subject to heat stress and its production rates worsen. If they are to be maintained, a factor that takes into account the climatic conditions should be applied. In any case, we consider that all livestock farmers focus their efforts on ensuring that each of the production indices is as good as possible.</p>			<p>Carbon Footprint based on the IPCC methodology, especially regarding the calculation of methane emissions.</p>
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76.	ANNEX I Section 3. C. PRODUCTION AND FEEDING DATA 1) i i) ii))	Consejo General de Colegios de la Profesión Veterinaria de España y Ilustre Colegio oficial de Veterinarios de la Región de Murcia (General Council of Associations of the Veterinary Profession of Spain and the Official Association of Veterinarians of the Region of Murcia)	It should be specified whether this applies only to fattening farms or to both fattening and breeding farms. It is understood that this only applies to fattening lots, but this should be specified.		Partly accepted	The text of Annex I, Section 3c(i) is amended, specifying that Subsection (i) applies to fattening and (ii) to suckler cow
77.	ANNEX I Section 3. C. PRODUCTION AND FEEDING	Consejo General de Colegios de la Profesión Veterinaria de España y Ilustre	As in the case of dairy cows, climate, rainfall and pasture quality in the case of farms that make use of the pastures strongly influence		Not accepted	Productivity indices are essential to correctly calculate emissions and the Carbon Footprint based on the IPCC methodology, especially regarding

	DATA 1) i) ii)	Colegio oficial de Veterinarios de la Región de Murcia (General Council of Associations of the Veterinary Profession of Spain and the Official Association of Veterinarians of the Region of Murcia)	the production rates and should not be taken into account.			the calculation of methane emissions.
78.	Annex I Section 3.C.2	Department of Agriculture, Livestock, Fisheries and Food, Generalitat de Catalunya	For the information on the feed supplied by type of animal, it is indicated that estimated data are used. To what extent can estimated data be accepted?		Not accepted	See justification for Submission number 46. However, the Farm Nitrogen Balance (BNG) tool in the case of cattle is not regulated in Catalonia.
79.	Annex I Section 3 Bovine Species, Sub-section C.2	Regional Ministry of Agriculture, Livestock and Ru-	The information relating to the feed supplied is excessive, considering that it must also be	Eliminate or reduce the obligation to enter data for each feed supplied to	Not accepted	In relation to the concern expressed about the high administrative burden and repetition of data re-

		<p>ral Development, of the Regional Government of Castile and León</p>	<p>completed for each feed for each category of animal and housing. Users of other species always express complaints about having to copy the same characteristics of feed supplied in each housing over and over again, complaints that would increase even more in cattle given the greater number of data and the categories described. While all this information can help to calculate emissions more accurately, we believe that the percentage it may represent of the total is insignificant for the work involved for the farmer.</p>	<p>each group of animals and accommodation, or where appropriate simplify the animal categories to reduce the amount of data that needs to be completed.</p>	<p>lating to the feed information provided in the ECOGAN system, the need to provide this detailed information must be justified in order to ensure a precise and rigorous calculation of polluting emissions and greenhouse gases from livestock holdings.</p> <p>1. Accuracy in the calculation of emissions and nutritional balances: The feed supplied is the main source of nitrogen and other nutrients that determine the amount of excrement, emissions of ammonia, nitrous oxide, methane and other gaseous pollutants in livestock farming. Having specific data on feed type, composition (percentage of crude protein, humidity, phosphorus, etc.), quantity supplied</p>
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					<p>by animal category and housing is essential to accurately estimate the excretion and, therefore, the emissions. Without this specificity, the calculations would be approximate and would not reflect the productive or environmental reality of the operation.</p> <p>2. Variability between animal categories and accommodations</p> <p>Each animal category and type of housing may have different requirements and consumption (e.g., piglets, breeding sows, fattening), as well as different conditions that affect digestibility and excretion. The repetition of information for each housing, although it may be tedious, makes it possible to capture this variability and avoid er-</p>
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						<p>rors in the overall estimates.</p> <p>3. Management facilitated by IT tools The ECOGAN system has been designed to make it possible to enter the information in several phases, to save and reuse basic data, as well as to facilitate editing. In addition, constant improvements are being implemented to optimise the user experience, minimising unnecessary duplication through data copying and self-processing functionalities between similar housings and categories.</p> <p>4. Importance for regulatory compliance and access to aid The detailed provision of</p>
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						<p>feeding data is necessary for the correct implementation of mandatory emissions reduction plans and to justify reductions through the use of Best Available Techniques (BAT). This information may also be required to access aid, grants or sustainability certifications.</p> <p>For all the above reasons, the detail and thoroughness in the entry of feed data in ECOGAN is not only necessary to obtain valid and robust estimates of emissions, but is also an essential part of regulatory compliance and the technical environmental management of livestock farms.</p>
80.	Annex I Part 3.C.2. g) i	Department of Agriculture, Livestock,	The information required to be entered in each of the adminis-		Not accepted	The greater extent and detail in the information required for feed admin-

		<p>Fisheries and Food, Generalitat de Catalunya</p>	<p>tered feedstuffs is more extensive than for the porcine and poultry species. This information is very difficult to obtain on the part of the livestock farmer since it does not appear in the information provided to them by the supplier.</p>		<p>istered to cattle in ECOGAN, compared to the porcine and avian species, reflects the productive and nutritional complexity and variability specific to this species, which directly affects the reliability of the calculation of pollutant emissions and the nutrient balance.</p> <p>1. Productive diversity and variety of animal categories Cattle have a wide range of categories (rearing calves, dairy cows, beef cows, breeding stock, etc.), with very different nutritional requirements. This heterogeneity makes it necessary to describe the compositions and quantities of feed supplied with greater precision and segmentation in order to</p>
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					<p>adequately reflect the variability of consumption and its effects on nitrogen and phosphorus excretion.</p> <p>2. Greater variability in the composition and type of feed Bovine feeds are usually more diverse (forage mixtures, concentrates, mineral supplements), with complex nutritional compositions linked to production systems (intensive, extensive) and feeding technologies. Detailed knowledge allows for precise adjustment of the calculation of GHG emissions, ammonia and other gases, optimising environmental management plans.</p> <p>3. Impact of the food on production and emissions</p>
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					<p>As food is the main source of nutrients that determine the quantity and quality of excreta and gases emitted, having accurate and detailed data is essential. Incomplete or generic information reduces the reliability of the balances and can lead to significant underestimations or overestimations.</p> <p>4. Difficulty for the farmer While it is true that small-scale farmers do not always have all this detailed information, large producers, to whom the standard is addressed, have standardised procedures for accessing and properly communicating of this essential data to maintain a productive farm.</p> <p>In summary, the com-</p>
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						plexity and specificity of the information required for cattle feed are essential to achieve the quality and precision required for effective and regulatory control of livestock pollutant emissions from ECOGAN.
81.	ANNEX I Section 3. C. PRO- DUCTION AND FEEDING DATA 2) h)	Consejo General de Colegios de la Profesión Veterinaria de España y Ilustre Colegio oficial de Veterinarios de la Región de Murcia (General Council of Associations of the Veterinary Profession of Spain and the Official Association of Veterinarians of the Region of Mur-	The processes described are at odds with the use of poor-quality by-products or pastures; not only should the production of ruminal gases be taken into account, but also the environmental impact of the production of the food given to the animals. In addition, in cattle the rations are highly studied and adjusted to achieve a balance between ruminal functionality, the body condition of the animals and the production of the animals, the ration cannot be adjusted ac-		Not accepted	ECOGAN only performs estimates and data collection at farm level. For this reason, ECOGAN only calculates the farm's own emissions, not those originating "upstream and downstream".

		cia)	According to the gases that will be produced in the rumen. Specifically, in point ii. , the concentrates make feed more expensive, their production has a greater impact on the environment and they worsen ruminal functionality.			
82.	Annex I Section 3.D.2	Department of Agriculture, Livestock, Fisheries and Food, General- itat de Catalunya	Solid-liquid separation from external storage is not considered a treatment.	Include solid-liquid separation as a treatment for waste.	Not accepted	See justification for Submission number 38.
83.	Annex I Section 3.E.2	Department of Agriculture, Livestock, Fisheries and Food, General- itat de Catalunya	If you perform a prior solid-liquid separation treatment prior to accumulation in the external slurry storage system: Percentage of solid fraction handled after solid-liquid separation treatment Percentage of liquid fraction handled after solid-liquid separation		Not accepted	See justification for Submission number 38

			<p>treatment</p> <ol style="list-style-type: none"> 1) The liquid solid separation would have to be included in the treatment subsection when it is carried out from the external storage. 2) According to the structure of the document, in Subsections D (storage and management of liquid manure) and E (storage and management of solid manure), the solid-liquid separation performance data must be repeated. 			
84.	Annex I. Section 3 H	Regional Ministry of Agriculture, Livestock and Rural Development, of the Regional Gov-	We do not consider that livestock farmers should report the BATs for field application of manure produced on their farms, given that this information is not handled	Delete Subsection H of Section 3 of Annex I from the BAT register for livestock holdings.	Not accepted	The information contained in Subsection H becomes voluntary, it being possible to simply declare that information relating to how field application of manure is

		ernment of Castile and León	by the livestock farmer but by the crop farmer, regardless of whether Subsection H.1.a) allows for them to indicate that they are unaware of the field application system for manure. And if it so happens that the livestock farmer and the agricultural farmer are the same person, it should be in the field of agriculture where these techniques should be reported.			carried out is unknown. This Subsection H has been included in the three sections (three livestock species) as it is a subsection containing information to be declared voluntarily.
85.	ANNEX I Section 3. H. FIELD APPLICATION OF MANURE (SOLID/LIQUID)	Consejo General de Colegios de la Profesión Veterinaria de España y Ilustre Colegio oficial de Veterinarios de la Región de Murcia (General Council of Associations of	Specify whether it applies only to application to the farmer's own fields. In the event that the manure is managed by a third party authorised to do so, it becomes impossible to track its traceability and final use for the farmer.		Not accepted	This is a comment. Currently, the possibility of declaring a lack of knowledge about the destination of manure and their field application in cases where the manure is collected by an authorised manager external to the farm is already collected.

		the Veterinary Profession of Spain and the Official Association of Veterinarians of the Region of Murcia)				
86.	Annex II	Department of Agriculture, Livestock, Fisheries and Food, Generalitat de Catalunya	Animal category for all species.	Type of animal housed. It would be easier to indicate the categories of the REGA instead of the categories of animals according to the Zootechnical Documents establishing the Nutritional Balance of Nitrogen and Phosphorus in livestock farming. Another option would be to develop conversion formulas from one category to an-	Not accepted	The calculations made in ECOGAN require more specific categories that have been defined in the documents: "Zootechnical Bases for the calculation of Nitrogen and Phosphorus" for each species. These categories are defined on the basis of all the information collected throughout the historical series of these documents which justifies the creation and differentiation of categories within each species on the basis of

				other.		<p>differences in their metabolism, productive management and other characteristics intrinsic to the production process which consequently result in different nitrogen and phosphorus excretions.</p> <p>That is why the Registry requires the categories of zootechnical documents in order to carry out reliable and real calculations, and cannot rely on the categories collected in REGA which do not take into account the differences between categories in terms of excrement and emissions.</p>
87.	Annex II. Section I	Regional Ministry of Agriculture, Livestock and Rural Develop-	The new description of the categories of animals of the porcine species does not include the production systems	Describe the categories of animals according to each productive system	Accepted	For further clarification we have included a text in Section 1 of Annex II specifying that they are the same categories for

		ment, of the Regional Government of Castile and León	implemented in ECOGAN relating to white and Iberian pigs.			white pigs and for Iberian pigs.
88.	Annex II.	General Directorate of Agricultural Production and Livestock Production Animal Production and Health Service. (Regional Ministry of Agriculture, Water, Livestock and Fisheries, Generalitat Valenciana)	The definitions include references to days of fattening for birds, weeks of laying, weeks of culling laying hens, etc., which in some cases do not correspond to reality as these data are highly variable.	All of those definitions should be reviewed in order to adjust them to current values.	Accepted	General definitions have been included that do not include production periods, although the ECOGAN application will maintain an information point to facilitate understanding.
89.	Annex II.	General Directorate of Agricultural Production and Livestock Production Animal Pro-	<i>White laying hens</i> "1. Caged white pullets: breeding and rearing of white laying hens in cages. 2. Caged white hens: laying birds of white	With regard to the repeated references to moulting, a definition of the concept of 'moulting' should be established in which	Not accepted	See justification for Submission number 60.

		<p>duction and Health Service. (Regional Ministry of Agriculture, Water, Livestock and Fisheries, Generalitat Valenciana)</p>	<p><i>strain intended for the laying of eggs for commercial use, which are not intended to moult. The laying period currently lasts about 73 weeks.</i></p> <p>3. <i>Caged white hens - 1st cycle: laying birds of white strain intended for the laying of eggs for commercial use, which are to have a subsequent moult in their first production cycle. This first laying cycle has a shorter duration than when not moulting, about 20 weeks less.</i></p> <p>4. <i>Caged white hens - moulting: laying birds of white strain intended for the laying of eggs for commercial use which are in the process of moulting, which lasts for about 6 weeks, during which egg production ceases.</i></p>	<p>compliance with animal welfare regulations is clear.</p>		
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			5. <i>Caged white hens - 2nd cycle: laying birds of white strain intended for the laying of eggs for commercial use, in their second production cycle after moulting. This second cycle lasts about 35 weeks, with the hens being discarded at about 111 weeks.</i>			
90.	Annex II.	General Directorate of Agricultural Production and Livestock Production Animal Production and Health Service. (Regional Ministry of Agriculture, Water, Livestock and Fisheries, Generalitat Valenciana)	As regards free range hens, the draft Royal Decree defines "Free-Range breeding hens: free-range hens in the phase of reproducing future laying/breeding hens."	This definition does not correspond to reality, as breeding hens do not usually have access to the outside and therefore cannot be called free-range.	Not accepted	The connotation "free-range" does not refer to whether or not there is access to the outside, but rather allows for a differentiation between strains. This corresponds to a technical definition that makes it possible to differentiate between strains of breeding hens for future laying hens in different production systems.

91.	ANNEX II SECTION 3. Productive Categories in Dairy Cattle	Consejo General de Colegios de la Profesión Veterinaria de España y Ilustre Colegio oficial de Veterinarios de la Región de Murcia (General Council of Associations of the Veterinary Profession of Spain and the Official Association of Veterinarians of the Region of Murcia)	Stating that the calves are for slaughter implies that they are sent to slaughter from the farm. In addition to this amendment, we consider that a category of breeding bulls should be added; they exist on many holdings. The category of unproductive cows destined for slaughter should also be added.	Male calves for sacrifice/fattening [...] Female calves for slaughter/fattening [...]	Partly accepted	Although this nomenclature corresponds to that of the zootechnical documents on which the developments for the BATs Register and the calculations carried out in ECOGAN are based, the definitions of male calf for fattening and female calf for fattening are accepted for greater user compression. However, the bull category is not considered in dairy cattle because its presence on this type of farm is very unusual. Nor are unproductive cows considered, as for these purposes they are considered to be included in the category of dry cows.
92.	ANNEX II SECTION 3. Productive	Consejo General de Colegios de la Profesión Veteri-	Firstly, the name should be 'Beef Cattle' and the category of beef cattle also includes suckler		Partly accepted	The heading has been changed to distinguish within beef cattle the categories of fattening

	<p>Categories in Beef Cattle</p>	<p>naria de España y Ilustre Colegio oficial de Veterinarios de la Región de Murcia (General Council of Associations of the Veterinary Profession of Spain and the Official Association of Veterinarians of the Region of Murcia)</p>	<p>cows. On the other hand, the proposed classification does not make much sense, as animals should be classified according to the type of feed they are given and not their age at the time of slaughter. Suckling calves are calves that are being fed by artificial lactation, regardless of the age at which they will be slaughtered, and pasture calves are calves that have already been weaned, regardless of whether lactation was artificial or natural. Suckling calves from dairy cows may pass through a feedlot where they are fed milk replacement and then remain in that same feedlot or be transferred to another, where they will complete their cycle,</p>		<p>cattle and suckler cow.</p> <p>Within the categories of fattening cattle and suckler cows, the categories of "Male calves for slaughter" and "Female calves for slaughter" are changed to "Male calves for fattening" and "Female calves for fattening".</p> <p>However, with regard to suckling calves, the proposed classification is maintained, but the definitions are amended to make them easier to understand.</p> <p>The proposed classification takes into account the classification established in the zootechnical documents based on the nutritional needs of the animals and their physio-</p>
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			<p>which does not necessarily have to be until 12 months.</p> <p>In the definition of oxen, the animals must be older than 4 years, as those up to 4 years are considered fattening cattle, not oxen.</p>		<p>logical stage, thus taking into account the classification of “Suckling calves” and “Pasture calves” for young animals in growth stage and up to the approximate age of one year as laid down in the bovine zootechnical document “Zootechnical bases for the calculation of the nitrogen and phosphorus dietary balance”.</p> <p>Finally, the definition of fattening cattle and oxen is changed, by taking into account the age of less than 4 years for fattening cattle and more than 4 years for oxen.</p> <p>Adult animals are included in the category of fattening animals (animals over one year old and under four years old), oxen, culling bulls and adult females for culling or retirement.</p>
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93.	AN-NEX II. SECTION 3. Productive categories in Suckler Cows	Consejo General de Colegios de la Profesión Veterinaria de España y Ilustre Colegio oficial de Veterinarios de la Región de Murcia (General Council of Associations of the Veterinary Profession of Spain and the Official Association of Veterinarians of the Region of Murcia)		1. Male calves for fattening [...] 2. Female calves for fattening [...] 8. Replacement heifers. Females intended for nursing that have not yet given birth and may be in its first-gestation pregnant females	Accepted	See justification for Submission number 91. Removal of the reference to first pregnancy is also accepted
94	General Submission	Cooperativas Agro-alimentarias de España	In conclusion, Cooperativas Agro-alimentarias de España considers that, with regard to the bovine sector, the provi-		Not accepted	Reducing the bureaucratic burden has been one of the guiding principles in the development of the ECOGAN Comput-

			<p>sions of Royal Decree 1053/2022 of 27 December, establishing basic rules for the management of bovine farms, provide a sufficient legal basis for the Autonomous Communities to obtain and collect, exclusively, information on the implementation of the Best Available Techniques on Livestock Holdings. In any case, if the Ministry of Agriculture, Fisheries and Food considers it necessary, the mechanism by which the Autonomous Communities sent this information to the Ministry, without adding an additional bureaucratic burden on the operators.</p>		<p>erised System. Currently ECOGAN is a computer service accessed by farmers, the Autonomous Communities and the MAPA to ensure high efficiency and fluidity in data processing, thus reducing the bureaucratic burden associated with the transfer of information.</p> <p>In addition to taking into account the regulations governing bovine management (Royal Decree 1053/2022), it is necessary to consider the regulations governing the registration of BATs (Royal Decree 988/2022), which establishes the notification procedure. Both standards have cross-references that ensure the obligation to use this system to notify it.</p>
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95	General Submission	General Directorate of Environmental Quality, Climate Change and Water of La Rioja	Amend the Royal Decree to simplify the data provided and reduce the periodicity of the notification according to the type and size of the livestock holding.		Not accepted	See justification for Submission number 1.
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96.	General Submission	General Directorate of Environmental Quality, Climate Change and Water of La Rioja	Increase the livestock unit (LU) thresholds for livestock farms to reduce the number of affected farms.		Not accepted	This aspect is regulated in the livestock management regulations. In any case, it makes no sense to increase the thresholds for LUs when a new Industrial Emissions Directive (Directive 1785/2024) has already been published which has drastically lowered the thresholds for all livestock species. Similarly, the thresholds set out in the Royal Decrees on land use planning were established with the aim of complying with the objectives of the national Emission Ceilings Directive.
97.	General Submission	General Directorate of Environmental Quality, Climate Change and Water of La Rioja	Conduct periodic sampling and experimental projects that allow data to be extrapolated for the calculation of emissions, for example, by type of: farm, livestock,		Not accepted	The MAPA prepares annual reports on the implementation of BATs, which include estimates and calculations of emissions based on internationally approved

			BAT applied, etc.			methodology that allow this type of analysis by type of operation etc.
98.	General Submission	General Directorate of Environmental Quality, Climate Change and Water of La Rioja	Clarify the scope of authority of each administration, taking into account that this Royal Decree is applied in the framework of livestock sector regulation and that the administration responsible for environmental matters has its own regulations.		Not accepted	Each regional administration has a different structure and distribution of powers, and it is their responsibility to clarify this matter.
99.	General Submission	General Directorate of Environmental Quality, Climate Change and Water of La Rioja	Simplify the regulations governing infractions and penalties, avoiding the simultaneous application of several complex rules.		Not accepted	Depending on the type of farm and the type of non-compliance, one rule or another will apply and it is not within the competence of this Ministry or this Royal Decree to carry out the requested simplification.
100.	General Submission	General Directorate of Environmental Quality, Cli-	To allocate economic funds and technical resources to the		Not accepted	The decision to allocate more economic and financial funds does not depend on, nor is it the

		mate Change and Water of La Rioja	management of the obligations imposed by European and state regulations. Only this will allow us to obtain the quality of information necessary for the calculation of the emissions of the sector and to know the effectiveness of the BATs.			subject of, this Royal Decree.
101	General Submission	DANONE	We consider the legislator's willingness to move towards a comprehensive climate strategy in the livestock sector to be very positive. In this regard, we believe that the introduction of environmental certification and compensation mechanisms that allow the compatibility of the data generated with carbon certification methodologies recognised by the EU would strengthen	Proposal: • Include an additional provision that recognises the possibility of technical interoperability between the system for calculating, monitoring and reporting livestock emissions and the carbon certification systems regulated by the European Union, in particular the CRCF Regulation (Carbon Re-	Not accepted	The issues raised in this allegation exceed the scope, object and content of this Royal Decree.

		<p>the technical and strategic value of the system regulated by Royal Decree 988/2022.</p> <p>The incorporation of this type of instrument would not only enrich the regulatory framework, but would also open up new opportunities for the livestock sector, by connecting environmental compliance with economic, reputational and innovation incentives.</p> <p>In particular, it would allow:</p> <ul style="list-style-type: none"> - Access to climate finance through the voluntary market or corporate insetting schemes. - Incentivising the adoption of sustainable practices through economic and reputational benefits. - Avoiding administrative duplication 	<p>movals and Carbon Farming).</p> <ul style="list-style-type: none"> • Promote methodological alignment with the CRCF Regulation and Royal Decree 214/2025, facilitating not only the transfer of data, but also meeting the same verification and certification requirements. <p>In this sense, the proposal contributes to strengthening the usefulness of the system as an environmental management tool, and, at the same time, responds to the need to build a regulatory framework that not only facilitates the reduction of emissions at the source,</p>	
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			<p>through interoperability with the European CRCF Register and the national register regulated by Royal Decree 214/2025.</p> <ul style="list-style-type: none"> - Reinforcement of the regulatory coherence between environmental monitoring instruments and climate certification mechanisms. In this way, the livestock emissions monitoring system would cease to be merely a regulatory compliance tool and become a driver of sectoral transformation, capable of activating business decarbonisation strategies and encouraging investment in environmental innovation. 	<p>but also allows for the certification of carbon removals associated with sustainable livestock practices.</p>		
102	General Submission	Consejo General de Colegios de la Pro-	Include positive contributions from holdings, such as associated agri-		Not accepted	The issues raised in this allegation exceed the scope, object and con-

		<p>fesión Veterinaria de España y Ilustre Colegio oficial de Veterinarios de la Región de Murcia (General Council of Associations of the Veterinary Profession of Spain and the Official Association of Veterinarians of the Region of Murcia)</p>	<p>culture and/or maintenance of ecosystems (grazing, etc.) and biodiversity, which should be taken into account for the complete and objective assessment of the environmental impact of the bovine sector in our country, and that is the ultimate purpose of the regulations relating to the 'management of livestock holdings' and of this Royal Decree.</p>			<p>tent of this Royal Decree.</p>
103	General Submission	<p>Consejo General de Colegios de la Profesión Veterinaria de España y Ilustre Colegio oficial de Veterinarios de la Región de Murcia (General Council of Associations of</p>	<p>The indirect impact of the different components of the ration should be included. The positive impact of using by-products from other industries (agriculture, biofuels, human food, etc.) should be assessed, as these can represent a considerable percentage of the</p>		Not accepted	<p>See justification for Submission number 81.</p>

		the Veterinary Profession of Spain and the Official Association of Veterinarians of the Region of Murcia)	ration, depending on the region and the production system. On the other hand, there should be an estimate of the environmental impact, in terms of CO2 generation per kg of raw material, depending on the material and the place of production.			
104	General Submission	Regional Ministry of Agriculture, Water, Livestock and Fisheries, Generalitat Valenciana	1.- One of the positive parts of this amendment is that it adapts to the information required by Regulation (EU) 2024/1244, which regulates what was previously the PRTR register. From now on, we understand that communication with ECOGAN is unique and there will no longer be double communication, which leads to bureaucratic overload and duplication of data held by the administration.		Not accepted	<p>This is in fact a comment. ECOGAN currently has a direct connection to the State Register of Emissions and Polluting Sources (hereinafter PRTR España). This connection makes it possible to transfer all the data in ECOGAN to PRTR in order to reduce the bureaucratic burden on owners of livestock holdings.</p> <p>Despite this, PRTR España additionally requires certain data that are not recorded in ECO-</p>

						GAN, so the declaration in ECOGAN only exempts operators from declaring a large part of the data required by PRTR but not all
105	General Submission	Regional Ministry of Agriculture, Water, Livestock and Fisheries, Generalitat Valenciana	In general, complying with the draft Royal Decree entails a significant additional administrative burden for the livestock farmer, especially for the bovine sector being newly incorporated in it and for the porcine and poultry farms not subject to the IEA to which the obligation to communicate annually is intended to be imposed. Filling in ECOGAN correctly not only involves the time needed to enter the data, but above all the ability to have all the data available on the farm, or the significant effort required to obtain		Not accepted	See justification for Submission number 9.

			it. Most livestock farmers need to use external technical services to carry out this communication (to have this communication carried out for them), which represents an extra annual expense for all these livestock farmers.			
106	General Submission	Regional Ministry of Agriculture, Water, Livestock and Fisheries, Generalitat Valenciana	Given the level of detail of the requested information, not everything is directly usable for the purpose of the regulation, which is emissions reporting. The request for information should be limited to what is strictly necessary, or alternatively, the need for such information should be explained or justified.		Not accepted	See justification for Submission number 21.
107	General Submission	Regional Ministry of Agriculture, Water, Livestock and Fisheries, Gen-	The description of production and treatment systems is very broad with the intention of covering all options.		Not accepted	In order to carry out the corresponding request for data in a homogeneous manner at national level, it is neces-

		eralitat Valenciana	Most often, they will all be very similar, and there will be options that are never chosen. A method should be established to update this list without having to amend the Royal Decree, since systems not contemplated at this time may appear and modifying the Royal Decree each time does not seem the most effective approach.			sary that these data be included in this Royal Decree. Although this Royal Decree has mechanisms to make small modifications through the corresponding Ministerial Order, in the case of substantial modifications such as this modification of the Royal Decree, a legal justification is required that corresponds to the level of modification to be carried out.
108	General Submission	Regional Ministry of Agriculture, Water, Livestock and Fisheries, Generalitat Valenciana	Repeated references are made to "moulting" in birds without there being a definition in any of the regulations. This concept should be defined to make it clear that it must comply with animal welfare regulations.		Not accepted	See justification for Submission number 60.
109	General Submission	Regional Ministry of Agriculture, Water,	In the case of cattle, we understand that according to Royal Decree		Not accepted	See justification for Submission number 9.

		Livestock and Fisheries, Generalitat Valenciana	1053/2022, only new type III farms and type IV farms will have to make the notification to ECOGAN. It will affect a small volume of farms in the Valencian Community, but it is important to highlight that many bovine farms are unaware of much of the information requested. It is therefore not only a matter of taking the time to fill in ECOGAN, but above all the work consists of collecting the information. Until now, such a level of detail has only been achieved in research projects on carbon footprint in farms.			
110	General Submission	Regional Ministry of Agriculture, Water, Livestock and Fisheries, Generalitat Valen-	Regarding the animal categories in Annex II, it is considered more correct and would facilitate communication to farmers if these corre-		Not accepted	See justification for Submission number 86.

		ciana	sponded to the categories included in the management regulations. In any case, they should be updated to be more in line with the reality of the production processes on farms.			
111	General Submission	Regional Ministry of Agriculture, Water, Livestock and Fisheries, Generalitat Valenciana	Finally, it should be defined in broiler farms that the responsibility for emissions cannot be attributed to producers during the three months following production when the manure is evacuated to management entities within a maximum of 4 days. We already presented a scientific report endorsing this observation.		Not accepted	<p>This is a comment. Emissions responsibilities are not regulated in this Royal Decree.</p> <p>The ECOGAN Computerised System is limited to collecting information on manure management at the farm level, and there is even the possibility of declaring complete ignorance of the destination or the way in which the farm manure is applied to the field once the farmer delivers it to an authorised external manager.</p> <p>Furthermore, if there is</p>

						no storage, emissions are not counted on the farm.
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ADDENDUM

The following are the arguments of the Valencian Community that were mistakenly omitted from the initial table, in order to avoid discrepancies in the numbering and ensure the correct correspondence with their justifications:

No.	Article modified	Author	Comment and Justification	Alternative proposal	Assessment	Justification
1	Article 2	Integrated Pollution Prevention and Control Service, Generalitat Valenciana	The definitions of the terminology used in this Royal Decree should be expanded.	e.g.: deep pit, shallow pit, flushing (in ANNEX I. B. 1. f.) iii)	Not accepted	Including technical definitions in all the concepts included in the Annexes of Royal Decree 988/2022 is not recommended since the length acquired by this regulation would complicate its reading and understanding by those concerned. However, these definitions are included in the ECOGAN computerised system itself and are accompanied by practical examples and images for greater understanding.
2	Art. 5.3	Integrated Pollution Preven-	It would be useful to distinguish between holdings with	<i>One. Subsection 3</i>	Not accepted	See justification for Submission number 1, general table

		tion and Control Service, Generalitat Valenciana	IEA that have to report the information annually and other holdings, which only have to report in the case that they have undergone changes.	<p><i>of Article 5 is replaced by the following:</i></p> <p><i>"3. All owners of the holdings covered by the scope of this Royal Decree and Royal Decree 1/2016 will have to update, annually, and before 1 March at least, the mandatory data in Annex I. The remaining holdings covered by the scope of this Royal Decree shall have to communicate, annually, and before 1 March, the mandatory data in Annex I that have undergone changes concerning the previous communication."</i></p>		
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3	Art. 5.4	Integrated Pollution Prevention and Control Service, Generalitat Valenciana	There is a problem that the new draft Royal Decree does not solve and that is the duplication in the provision of data, since ECOGAN and PRTR have to be reported separately. It is essential to integrate the two records and that the information presented ONE TIME ONLY serves for both records	Two. Paragraph 4 of Article 5 is replaced by the following: <i>“4. The data communicated by the owner of the facility in accordance with the provisions of this Royal Decree shall be valid for the purposes of Royal Decree 508/2007 of 20 April, which regulates the provision of information on emissions under the E-PRTR Regulation and integrated environmental authorisations, and shall be consistent with the data reported by the operator to other applicable inventories and registers in accordance with the</i>	Not accepted	Subsection 4 of Article 7 of Royal Decree 988/2022 already establishes that the data calculated by ECOGAN shall be valid for the purposes of the E-PRTR Regulation. To this end, progress is being made in including fields in ECOGAN that are valid in the PRTR Registry and thus do not need to be communicated to it.
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				<i>current regulations."</i>		
4	Art. 7.3)	Integrated Pollution Prevention and Control Service, Generalitat Valenciana	Given that data relating to field application have been introduced, it is suggested that Article 7 should refer to calculations outside the farm.	<p><i>After: (...) In addition, ECOGAN will calculate the total nitrogen and phosphorus excreted from the holding.</i></p> <p>It is suggested to add the following: <i>"as well as emissions up to their incorporation into the soil"</i></p>	Not accepted	The scope of Royal Decree 988/2022 and therefore of ECOGAN refers to the farm itself and therefore ends with the application in the field.
5	Annex I. Subsection (I) of Section 1.A and Section 2.A	Integrated Pollution Prevention and Control Service, Generalitat Valenciana	Among the information to be provided, it is essential to indicate whether or not the integrated environmental authorisation has been reviewed or not in accordance with the BAT conclusions for the sector. This aspect cannot be ignored for the purposes of requiring the implementation of BATs. In addition, it is important to include the reference	<p>In Annex I, amend Subsection (I):</p> <p><i>l) Availability of Integrated Environmental Authorisation. Environmental identification number (NIMA) and IEA number. If the Integrated Environmental Authorisation has been re-</i></p>	Not accepted	<p>In order to improve coordination between PRTR and ECOGAN, the REGA code of each livestock farm was defined as a common field, and based on the REGA it is possible to know the environmental authorisation number of each livestock farm.</p> <p>Therefore, knowledge of these specific data related to other environmental legislation is con-</p>

			(whether or not an IEA is required) in order to locate the holding and report its emissions, improving the unavoidable integration with the PRTR.	<i>viewed in accordance with the BAT conclusions. Year of last revision of Integrated Environmental Authorisation</i>		sidered unnecessary for the purpose of the Royal Decree.
6	ANNEX I Section 1 A j)	Integrated Pollution Prevention and Control Service, Generalitat Valenciana	If cadaveric hydrolysis occurs, this possibility should be considered.	j) Indicate whether the carcasses are hydrolysed.	Not accepted	This subsection relates to compliance with BAT 2 of good environmental practice, which takes into account whether the carcasses are stored in a way that avoids or reduces emissions and not the possible treatment of emissions.
7	ANNEX I Section 1 A.k. iv)	Integrated Pollution Prevention and Control Service, Generalitat Valenciana	It is important to verify the impermeability and watertightness of all manure conveyance and storage infrastructures	To be in possession of a certificate by a competent technician of impermeability and watertightness of these infrastructures - including those containing sanitary water - and a leachate collection system.	Not accepted	The aforementioned subsection is related to compliance with BAT 18 to prevent emissions to soil and water generated by the collection and conveyance of slurry. For this purpose, Subsection (iv) has been included: <i>"If the slurry structures and storage systems are constructed/manufactured in such a way as to support the mechanical, chemical and thermal stresses associated with the slurry volume. If they</i>

						<i>are built to be leak-proof. If new sheds have leak detection systems. If the structural integrity of the deposits is checked at least once a year".</i>
8	ANNEX I. B. 1. j)	Integrated Pollution Prevention and Control Service, Generalitat Valenciana	It would be useful to know the source of the data in order to establish the manure calculation	Source: 1.- Ministerial Royal Decree 2.- Regulations of the Autonomous Communities	Not accepted	This is a comment, not a Submission. To find out which standard supports the collection of information for the calculation of emissions based on the provisions of this Royal Decree, you can proceed to read its preamble where reference is made to the regulations that support it.
9	ANNEX I. B. 2. b) iii	Integrated Pollution Prevention and Control Service, Generalitat Valenciana	Royal Decree 306/2020 establishes that there must be external storage capacity for a minimum of three months (Art. 9).	Add: minimum 3 months of external storage availability	Not accepted	As this requirement is already regulated in the corresponding regulations for the management of the different livestock sectors, it is not the subject of this regulation.
10	ANNEX I. H.	Integrated Pollution Prevention and Control Service, Generalitat Valenciana	It would be useful to provide the Manure Management Plan, with the date of its preparation (a reminder that it must be renewed every 5 years)	Attach Manure Management Plan	Not accepted	The manure management plan is a requirement of the rules for the management of livestock species and is not subject to the scope of this Royal Decree
11	ANEXO I. H.1 c)	Integrated Pol-	According to Royal De-	Remove these two field	Not ac-	The options must be maintained

	viii-ix	<p>lution Prevention and Control Service, Generalitat Valenciana</p>	<p>Decree 1051/2022 of 27 December, establishing standards for sustainable nutrition in agricultural soils. <i>Article 10. Application of manure, organic fertilising products and other materials of organic origin.</i> <i>1. <u>The application of slurry by means of plate, fan and cannon systems is prohibited, except in the following cases (...)</u></i> We understand that these two techniques are prohibited, with very few exceptions. The option to choose this technique should not be given, its use could be widespread. This leads to confusion.</p>	<p>application techniques for liquid manure: cannon and disc spreader.</p>	<p>cepted</p>	<p>since, although it is true that these techniques are prohibited except for in certain cases, we cannot rule out their use in permitted cases. On the other hand, in the event that the farmer declares their use in an unjustified case, it may serve as a warning signal for an inspection to be carried out.</p>
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