

**IFA submission
to the Department of Agriculture Food and the Marine's consultation
on the draft adaptation plan for the agriculture and forest sector.**

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Dublin 12**

January 2017

Introduction

Ireland faces considerable challenges in meeting EU climate obligations, with the Climate Change Advisory Council expressing concern that official projections of greenhouse gas emissions indicate that Ireland will not meet its 2020 emissions targets.¹ Therefore, all sectors have an obligation to act.

In the case of food production, national climate adaptation plans must be aligned with European and international policy. In particular, the October 2014 European Heads of Government energy and climate package highlights the need for coherence between the EU's food security and climate change objectives. It emphasizes the need to examine the best means of encouraging the sustainable intensification of food production, while optimizing the sector's contribution to greenhouse gas mitigation and sequestration.

This was reaffirmed by international leaders in December 2015, with Article 2 of the Paris climate agreement specifically referring to the need to ensure that food production is not threatened when addressing the climate challenge.

Central to the European and International positions is the fact that not all countries and regions in the world will continue to be able to increase food supplies to meet increasing global demand, as set out in figure 1.

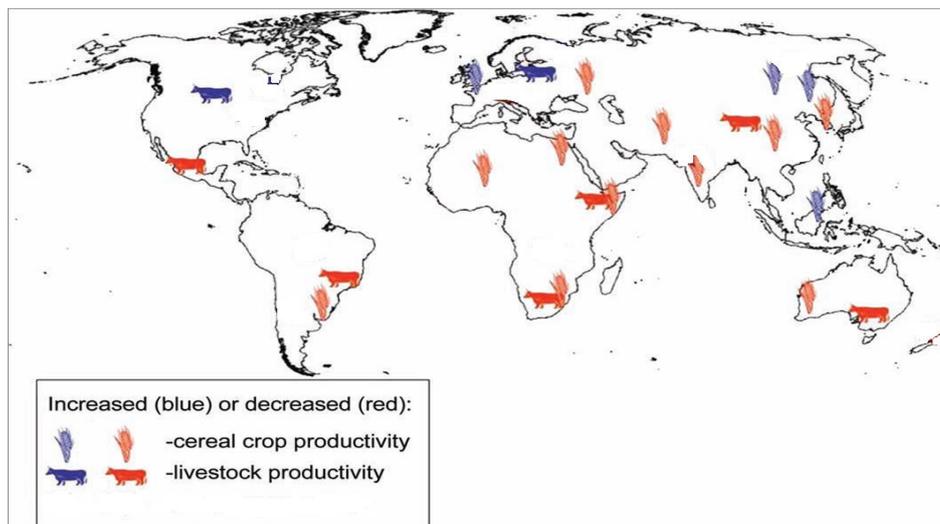


Figure 1: International productivity trends by 2050

Source: UNFAO

However, this is not a case for inaction. Ireland is a global leader in sustainable food production, being the only country in the world that measures, monitors and manages carbon from farm to fork. Presently over 90% of beef exports are now in an audit and carbon foot printing programme. 100% of milk production is entering into a carbon auditing cycle. In addition, over 100,000 carbon assessments have been completed on farms to date, as part of Bord Bia's Origin Green programme. This programme is the only programme in the world that operates on a national scale, with collaboration between Government, the private sector, food producers and farmers.

¹ Climate Change Advisory Council (November 2016) *First Report*

Also, each year several hundred farmers participate in the IFA led voluntary initiative called *Smart Farming*, which aims to address the dual challenges of improving farm incomes while reducing environmental impacts, including greenhouse gas emissions.

This good work will continue and represents a cornerstone to addressing the climate challenge as the sector also adapts to changes in the environment. IFA's submission looks at some of the vulnerabilities of the agri-food sector and identifies the necessary measures required to build resilience. The delivery of these measures is essential to support adaptation.

Adaptation actions

1. National actions

1.1 Flooding

Recent flood problems in late 2015 and early 2016 highlight the increased recurrence of flooding. In the many areas where previously flooding recurred as a 1 in 100-year event, peak flooding has taken place in 2009 and again in 2015/16. This leads to a situation where there is a need for increased investment in flood defences to protect both urban and rural areas. Flood management in Ireland has, up to recent times, been reactive and haphazard, with no real national plan. However, the proposed co-ordination of flood management through the CFRAMS Flood Management process is welcomed and timely.

IFA recommends that the scope of the CFRAMS Flood Management Plans be extended to cover all rural areas and farmlands. Where works are proposed in these Plans, a better balance is required between the environmental good and the public good, so that farm families and communities are not left in unacceptable conditions because of inaction.

Scientific evidence gathered over many years supports the view that tree planting in upland areas can help reduce flood risks as part of a broader package of flood management measures. CFRAMS Flood Management Plans should examine the case for enhanced tree planting in areas severely affected by flooding.

IFA calls for the immediate publication of a plan of action, including timelines, for works that will take place and will have an impact on future flood events.

IFA restates its call for a single agency to assume responsibility for the management of water levels on the River Shannon. In addition the maintenance works announced, including dredging must continue, to ensure the adequate flow of water.

The cost benefit analysis of the OPW minor works scheme needs to be revised to take account of all farming losses including output, direct payments and remedial costs incurred.

1.2 Efficiency of production

Scope exists in livestock production to adapt to the challenges of climate change, by improving on farm efficiency.

The on-going climate focus of policy makers in Ireland is having a real impact, with almost 90% of the measures in the national Rural Development Programme having climate reducing elements. This is paying real dividends, with emissions intensity per calorie of food output in 2013 being approximately 14% below 2005 levels.

This figure is projected to reach 25% by 2030, based on the delivery of current policy measures including the Beef Data and Genomics Programme, the Targeted Agricultural Modernisation Scheme, the Green Low-Carbon Agri-Environment Scheme and participation in the IFA led *Smart Farming* initiative.

IFA recommends further targeted payment measures be introduced to support adaptation by focusing on supporting better agronomic practices, such as nutrient management planning and alternative breeding strategies.

1.3 Substitute wood for non-wood fossil fuels and building materials

There is significant potential for increasing wood substitution in Ireland. Government regulations can have a large impact on the use of wood. Greenhouse gas emission limits, mandatory purchase of green electricity, restrictions in the use of certain kinds of materials and legal distinction between waste and goods could all facilitate the increased use of wood.

IFA recommends that climate change and energy policies should support and promote innovative ways of using wood as part of adaptation plans.

2. Livestock management

The projected changing weather patterns, in terms of scale and frequency of extreme events, as set out in the consultation document, provides a focus point for livestock breeding strategies in Ireland.

IFA recommends that agencies, including ICBF and Sheep Ireland, develop and communicate alternative breeding strategy programmes, which consider changes identified in the consultation document.

The global leadership role in the measuring, monitoring and management of carbon in Ireland is underpinned by the collaborative approach by Government, state agencies and industry through programmes such as the Quality Assurance Scheme and the Sustainable Dairy Assurance Scheme.

IFA recommends that this collaborative approach should continue, with the additional focus of economic sustainability, which demonstrates improved farm returns that can be delivered through participation in schemes such as the Quality Assurance Scheme and the Sustainable Dairy Assurance Scheme.

3. Land management

3.1 Recognising the value of carbon

Ireland's farmers are to the forefront in sequestering carbon. The Country has one of the largest percentages of permanent pastures in the European Union and provides major carbon sinks in the private forest estate.

To support adaptation, IFA recommends that the grassland value of farmland is recognised where a significant proportion of the land is permanent pasture. Also, the carbon sink associated with vegetation, such as hedgerows, must be recognised.

IFA recommends that the calculation of agri-environment payments, such as GLAS and forest premium payments, must take account of the value of carbon reduced. This should be added to the income foregone and cost of compliance calculation.

In the case of Natura areas, a value should be given to the measures undertaken to enhance the habitat under a management plan.

3.2 Greening under CAP

'Greening', which was introduced under the 2013 CAP reform, requires farmers to complete certain measures including maintaining permanent grasslands, diversifying crops and dedicating 5% of arable land to ecological focus areas.

The delivery of these actions is intended to contribute to addressing greenhouse gas emissions by:

- making soil & ecosystems more resilient by growing a greater variety of crops
- conserving soil carbon & grassland habitats associated with permanent grassland
- protecting water & habitats by establishing ecological focus areas.

However, the CAP Greening requirements (particularly the two and three-crop rules) have become both difficult and costly to implement for tillage farmers.

IFA seeks a reduction on the Greening compliance burden and increased funding to allow for the expansion of the protein crop area eligible to receive the full coupled payment.

3.3 Developing alternative land uses

Adaptation to climate change in Ireland presents opportunities to address other challenges, such as EU renewable energy obligations and provides an alternative income source for farm families, while developing alternative land uses.

On renewables generally IFA calls on the Department of Communications, Climate Action and Environment to convene the proposed National Energy Forum, to co-ordinate a coherent energy response to adapting to climate change.

On biomass IFA seeks the introduction of a meaningful renewable heat tariff structure that will enable growers to generate a viable alternative income stream from the sale of biomass.

On solar energy IFA seeks the announcement of renewable feed-in tariffs, which support community participation, farm scale production and provide an annual community dividend.

IFA also calls for the publication of enforceable set-back distances for wind and solar projects, which safeguard homeowners and other sensitive properties, such as schools.

3.4 Enactment of the hedge cutting and gorse burning changes in the 2016 Heritage Bill

The consultation document refers to the "likely" increase in the number of annual dry periods and the associated risks of wildfires.

IFA recommends that the changes regarding hedges and gorse burning proposed in the 2016 Heritage Bill are introduced immediately. This will allow for the better and safer management of the hills and hedgerows, as well as getting an appropriate balance between safety and environmental obligations.

3.5 Implementation of risk assessment and risk warning systems

Climate change will increase the frequency and intensity of extreme events not just wild fires. The implementation of risk assessment and risk warning systems need to be extended to include storm, flooding as well as less visible risks.

Climate change has resulted in increases in average and extreme wind speeds storms. For example, in 2014 Storm Darwin Storms flattened large expanses of forests with serious ramifications for the economic situation of forest owners. In contrast to most agricultural crops, forests are exposed to the risk of such disturbances during each year of rotations that span decades before any profit on the initial investments can be made.

IFA calls for the implementation of risk assessment and risk warning systems as well as practical measures to assist farmers and forest owners minimise the risks to production of extreme weather events.

3.6 Implementation of Sustainable Forest Management

Sustainable Forest Management (SFM) can be applied to reduce the exposure and sensitivity of forests and therefore its vulnerability, and enhance its adaptive capacity. However the principles of SFM will need to be adapted to adjust to new threats and risks associated with climate change. It is paramount that forest owners are consulted and agree appropriate adaption measures and policies. Forest policy measures must support forest owners to take the actions necessary to ensure Sustainable Forest Management under changed climatic conditions.

IFA calls that forest owners actively participate in decision making processes in planning adaption measures and practices. Forest owners must be supported to successfully adapt forest management measures.

3.7 Adaptive forest governance policies to limit deforestation

The environmental requirements for afforestation will result in deforestation in the forest sector as plantations enter second rotation stage. The rigidity in the requirements to set aside large areas of land for biodiversity that previously were forested, will reduce timber production and the amount of carbon sequestered.

IFA calls for the impact on forest cover to be considered and analysed when introducing new policies on afforestation and a greater flexibility in the adoption of the policies to manage the level of deforestation.

4. Knowledge transfer and communication

For farmers, successful knowledge transfer is dependent on the availability of relevant and easily understood data. In this regard the development by Teagasc of the Nutrient Management Planning tool is welcomed. It will provide colour coded fertilizer and liming application guidance to farmers, which easily interprets the results of soil tests.

To assist in the adaptation to climate change through better resource management, IFA proposes that the Nutrient Management Planning tool should be made available to farmers at no cost for a two year period and on a least cost basis thereafter.