



Amendments to Climate Action Bill to protect Irish agriculture

To properly address climate change, it is important that the Bill accurately reflects the different global warming impact associated with biogenic methane, and provides farmers with fair and reasonable means to manage emissions and reduce the impact on the environment.

The emission reduction target for agriculture must remain in line with the roadmap for the sector that sets a pathway to reduce emission by 10 – 15% by 2030. Irish agriculture is one of the most sustainable in the world. The sector can continue to improve efficiency and reduce emissions, but farmers must be given time for new practices and technologies to be adopted and their mitigation measured and verified.

IFA is seeking the following changes to the Climate Action and Low Carbon (Amendment) Bill:

1. Carbon budget

The definition of carbon budget in the Bill **must take account of removals as well as emissions** and this should be explicitly stated in the definition, so it is consistent with the national climate objective. The definition should read:

"Carbon budget means the total amount of greenhouse gas emission less removals that are permitted during the budget period".

When preparing the carbon budget, the Climate Change Advisory Council (CCSC) should **be required to take account of the special economic and social role of agriculture**, similar to the requirement placed on the Minister and the Government when preparing the climate action plan and national long term climate action strategy. This would require an amendment under Section 9 subsection (9) (ii).

2. Biogenic methane

To best represent the temperature impacts and the distinct characteristics of biogenic methane as a short-lived climate pollutant (SLCP), **IFA propose that a separate target for biogenic methane should be set**. This is consistent with the recommendations of the CCAC and would recognise the challenges to monitor, verify and accurately report mitigation efforts for methane emissions.

To assist in the preparation of the climate action plan, national long term climate action strategy and carbon budget greater clarity is needed with regard to what is meant by "*the distinct characteristics of biogenic methane*". IFA propose the following clarification:

"The distinct characteristics of biogenic methane as a short-lived gas which is part of the natural cycle and which does not contribute to additional global warming once it is in equilibrium".

This amendment should be adopted under Section 6 subsection (8) (n) and Section 9 subsection (9) (a) (ii) (II).

3. Carbon leakage

In the Bill, carbon leakage is defined as '*the transfer, due to climate policies, of production to other countries with less restrictive policies with regard to greenhouse gas emissions*'. The reference to 'substantial and unreasonable' carbon leakage under Section 6 subsection (8) (j) should be removed and amended to:

"the risk of carbon leakage as a consequence of measures implemented by the State to pursue the national climate objective".

The **CCAC should be required to take account of carbon leakage when preparing the carbon budget**, similar to the requirement placed on the Minister and the Government when preparing the climate action plan and national long term climate action strategy. Section 9 subsection (9) (a) (ii) should be amended to take account of "the risk of carbon leakage as a consequence of measures implemented by the State".