

Adaptation Consultation
Climate Change and Bioenergy Policy Division
Department of Agriculture, Food and the Marine
Pavilion A
Grattan Business Centre
Portlaoise
Co Laois
R32 K857

16 August 2019

Re: Climate Change Adaptation Plan

To whom it may concern,

ICOS welcomes the opportunity to respond to the public consultation on a draft climate change adaptation plan.

ICOS is the umbrella body for over 130 co-operatives in Ireland – including the Irish dairy processing & milk purchasing co-operatives, livestock marts and rural based enterprises and services – whose associated businesses have a combined turnover in the region of €14 billion, with some 150,000 individual members, employing 12,000 people in Ireland, and a further 24,000 people overseas.

I would like to take this opportunity on behalf of ICOS to make the following comments and observations:

- ICOS welcomes the publication of the draft adaptation plan and agrees fully with its four overarching objectives, as the agriculture, forestry and land use sectors are uniquely affected by the challenges posed by climate change.
- On the one hand, agriculture can contribute to the release of greenhouse gas emissions, while on the other hand, the sector can provide opportunities to reduce greenhouse gas emissions in the atmosphere through carbon sequestration.
- Additionally, Irish agriculture as outlined in detail in the Teagasc marginal abatement cost curve can contribute significantly to the mitigation of greenhouse gases, while at the same time efforts are needed to build resilience within the sector, so as to ensure Irish agriculture is adequately prepared for the consequences of climate change due to changing weather patterns and growing seasons.
- The extreme weather events in 2017-18 including the impact of ex-hurricane Ophelia, heavy snow, a prolonged cold and wet spring, followed by a summer drought tested the resolve of the entire agri-food sector.
- The extreme weather resulted in a rise in production costs at farm level due to increased feed usage, once again highlighting that there are inadequate policy tools in place to manage income volatility affecting family farms.

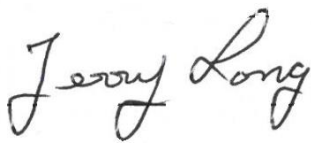
- ICOS calls on the Government to consult and work with the stakeholders in the agri-food sector to develop a practical and workable risk management tool, which is mandatory under the new Common Agricultural Policy post 2020. The final adaptation plan should recommend this as a priority action for DAFM in the context of the CAP Consultative Committee. In addition, ICOS strongly encourages the Government to adopt a new agri-taxation measure based on the ICOS 5-5-5 proposal, which is a cost-effective risk management measure designed to stabilise family farm incomes.
- During the 2017-18 fodder crisis, the co-op sector responded strongly to the needs of milk supplies through the provision of a wide range of supports including importing fodder from the UK and the continent, the matching up of fodder between suppliers, co-op farm advisory teams worked with farmers to identify fodder requirements and appropriate feeding regimes in order to stretch fodder stocks, co-ops discounted ruminant feed purchases, mills were operating on a 24/7 basis and co-ops applied flexible approaches towards credit.
- ICOS worked closely with DAFM on the provision of appropriate supports for the sector and participated in the Fodder Inter Agency Committee chaired by Teagasc. The Fodder Inter Agency Committee proved to be an effective body, which developed key communication messages to farmers and advice and recommendations to DAFM.
- The Fodder Inter Agency Committee issued short-term and long-term conclusions. The implementation of the long-term conclusions in particular should be prioritised in the adaptation plan. Recommendations included the carrying out of a national fodder census in July and November each year, farmers should plan to carry a reserve of silage 2 months in excess of that required for a normal winter, improved soil fertility should be encouraged and promoted, expanding farmers should match stocking rate to average grass growing capacity, contract farming arrangements and a more joined up approach between farming systems should be encouraged and promoted, greater use of decision support tools and ensuring necessary facilities to store fodder and to allow restricted feeding of forage so that available silage can be spread over the winter period, when necessary.
- There is considerable scope to increase grass and silage production, while improving environmental outcomes through improved soil fertility. In this context, it is important to recognise the importance of the ASSAP programme, which is a new method to achieving improvements in water quality by providing free and confidential advice via fully trained sustainability advisors. It is an innovative Government/industry collaborative initiative that will run from 2018-2021 and will target up to 23,000 farmers over this period.
- The draft adaptation plan notes that the high rainfall and poor grass supply conditions from 2017-18, not only requires a fodder reserve but it is also necessary to have sufficient slurry storage in place. ICOS calls on DAFM to ensure that expanding farmers, in particular have access to the Targeted Agricultural Modernisation Scheme (TAMS II) grant aid to ensure that farmers make the appropriate investment in slurry storage capacity to manage longer winter periods.
- In late 2017, extreme weather including ex-Hurricane Ophelia and Storm Brian resulted in enormous infrastructural damage at farm level. The response of rural communities demonstrated the best qualities of co-operation and community spirit with farmers and co-

operatives working tirelessly to assist their neighbours and members without power for a lengthy period. The storms resulted in several difficulties at farm level and disrupted milk collection in several parts of the country.

- The impact of the storms also demonstrated the severe shortage of suitable generators available on farms. With extreme weather likely to increase due to climate change, it is essential that farmers are encouraged to invest in a generator to future proof their businesses against power outages.
- As a consequence, ICOS calls for an amendment to TAMS II to provide grant aid for the provision of standby generators and associated changeover switches. We believe it would be sensible to make the installation of a changeover switch mandatory as part of all new parlour and dairy electrical installations, with an appropriate increase in the relevant reference cost.
- Furthermore, Storm Emma in March 2018 resulted in severe challenges to milk collection and bulk feed deliveries. Significant efforts were made by farmers, drivers and co-op milk advisors and supply teams to ensure milk was collected from farms on time. ICOS calls on the adaptation plan to ensure local authorities have appropriate contingency plans in place to ensure the clearing of roads to dairy farms during periods of prolonged heavy snow.
- Improvements in farm safety should be a central component of the climate change adaption plan due to the additional health and safety risks arising from extreme weather events for farmers and farm families.

Thank you for the opportunity to contribute to the public consultation and ICOS looks forward to engaging constructively and positively with the Department of Agriculture, Food and the Marine on this important issue and the pressing environmental issues affecting agriculture and wider society.

Yours sincerely,



Jerry Long
President