

Mr Alan Kelly TD
Minister for the Environment, Community and Local Government
Department of the Environment, Community and Local Government
Custom House
Dublin 1
D01W6X0

Sent by Post & Email

31st July 2015

Re: Consultation on the development of Ireland's first National Low Carbon Transition and Mitigation Plan to transition Ireland to a low carbon economy by 2050

Dear Minister,

The Irish Co-operative Organisation Society Ltd (ICOS) welcomes the opportunity to participate in this important public consultation on the preparation of Ireland's first National Low Carbon Transition and Mitigation Plan.

ICOS represents farmer owned co-operatives and organisations in Ireland 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.

ICOS fully supports the Climate Action and Low Carbon Development Bill 2015, which includes the establishment of a National Low Carbon Transition and Mitigation Plan (NMP). The NMP will be a key instrument in Ireland's overall efforts to reduce greenhouse gas emissions (GHG) by 2050.

The background paper outlines the development of the NMP to date including the National Policy Position on Climate Change approved in 2014. The NMP will be guided by a long term vision for agriculture based on carbon neutrality, which does not compromise capacity for sustainable food production. In practice, this means that by 2050, national GHG emissions from agriculture are fully offset by carbon sequestration by grassland soils, forestry and other land use.

In the context of your consultation, ICOS supports the aspiration to reach carbon neutrality in agriculture by 2050. However, the achievement of carbon neutrality by 2050 will be an extremely challenging and demanding task for Irish agriculture. ICOS points out that the achievement of carbon neutrality will be largely dependent on the eventual outcome of negotiations at an EU and international level on future climate change policy.

In this regard, ICOS welcomes the decision of the European Council in October 2014 to recognise the multiple objectives of agriculture, the limited mitigation potential within agriculture, the importance of food security as a twin challenge facing mankind along with climate change and to integrate land use, land use change and forestry into the EU's 2030 climate and energy policy framework. However, the translation of this important decision into future binding targets set at an EU level will be fundamentally important to the overall achievement of carbon neutrality by 2050.

ICOS maintains that at the heart of future policy concerning agriculture adopted at a national, EU and international level must be the objective of reducing the carbon intensity of agricultural activities, while increasing carbon sinks from other land use to offset emissions.

Key to reducing the carbon intensity of agricultural production is the adoption of technically feasible abatement measures through better farm management practices. There are significant efforts at mitigation taking place in Irish agriculture at present, through production efficiency, fertiliser and manure management, grazing management, improved genetics, better fertility and enhanced nutrition technologies. The industry is also currently implementing world leading quality assurance schemes, with farms being independently audited to the highest quality standards, as well as undergoing an assessment of their sustainability position with the outcomes of that assessment used to target improvements.

The 2013 Reform of the Common Agricultural Policy, which includes greening measures and rural development initiatives such as the Beef Data and Genomics Programme, will underpin these considerable efforts to reduce emissions from Irish agriculture. However, overall mitigation in Irish agriculture is limited, with Irish agricultural production widely acknowledged as a global leader in terms of carbon efficiency due to our natural, grass based beef and dairy systems. The reality is that much of the low hanging fruit for reducing emissions from agriculture has been picked.

ICOS strongly believes that there is a significant and to-date untapped opportunity to offset agricultural emissions through carbon sequestration. The carbon sinks with highest potential include permanent grassland, cropland, peatland/wetland and forestry. Further research into the carbon sequestration under grassland soils will be required, with appropriate accounting methodology developed in order to accurately record its contribution as a carbon sink. In addition, the full implementation of Ireland's national forestry programme, which aims to expand afforestation by 11% of land area today to 18% by 2046 is of critical importance.

The bioenergy sector can make a considerable contribution to GHG mitigation through energy and material substitution. However, other economic sectors including transport and energy avail of the credit in mitigation terms. In order to ensure environmental integrity, the bioenergy sector which uses agricultural land should be accounted for under the land use sector.

Finally, an important stipulation to the carbon neutrality vision for agriculture by 2050 is that progress towards this objective does not compromise capacity for sustainable food production. For example, over recent years, dairy processing co-operatives and farmers have made significant investment in advance of the abolition of milk quotas. ICOS strongly believes that it is an imperative that our agri food sector is fully supported into the future and permitted to compete internationally and grow market share. As such, ICOS believes that it is essential to view agricultural GHG emissions in the context of the 35 million people we feed throughout the globe instead of related to our 4.5 million population. Ireland's agri food exports are recognised internationally by the quality of the final product produced, and this mark of quality is intrinsically linked to the quality of our environment.

In conclusion, ICOS shares the ambition of Government, which is to ensure that Ireland is competitive, climate resilient and environmentally sustainable by 2050. The agri food sector, as Ireland's largest indigenous industry will play a central role in the achievement of this vision.

ICOS looks forward to future opportunities for stakeholder engagement that will arise in due course on the draft NMP.

Yours sincerely,



Martin Keane
President