



European Commission consultation on the integration of agriculture, forestry and other land use into the 2030 EU climate and energy policy framework

1. In your view, which of the multiple objectives of agriculture, forestry and other land use will gain most in relative importance by 2030?

The twin challenges of climate change and global food security will gain most in relative importance by 2030. The UN predicts that the global population will increase to 9.6 billion by 2050. As a result, the World Bank estimates that global food production must produce at least 50% more food to meet the demand of an increasing population. However, the negative impacts of climate change may reduce crop yields globally by more than 25%. Demand for water, land and other scarce resources will also increase, adding further pressure on the environment. ICOS, the representative body for farmer owned co-operatives in Ireland believes that the future policy framework must support the sustainable intensification of food production in order to adequately address these twin challenges. In addition, the concept of carbon intensity must be fully incorporated into future policy, so as to avoid carbon leakage and to accurately measure the impact of food production on global climate change.

2. How can the contribution of agriculture, forestry and other land use to the production of renewable energy and raw materials be optimised, while fully exploiting the mitigation potential in these sectors?

EU policy requires a joined-up approach to agriculture and other land use policies, in terms of mitigation and accounting. While recognising that food production does give rise to GHG emissions, it is also essential to recognise and take into full account the contribution of permanent grassland and afforestation as carbon sinks. ICOS maintains that at the heart of future policy must be the objective of reducing the carbon intensity of agricultural activities, while increasing carbon sinks from land use. Key to reducing the carbon intensity of agricultural production is the adoption of technically feasible abatement measures through better farm management practices. The CAP including greening measures and rural development initiatives will underpin these efforts. Finally, the promotion of renewable biomass is critical for climate change mitigation, as utilising land use with the various strands of bioenergy can make a significant contribution to the reduction of GHG emissions.

3. How can the new framework ensure a fair and equitable distribution among Member States of action for mitigation in agriculture, forestry and other land use and reflect biophysical, geographical, and socio-economic variability and differences among Member States?

It is critically important that biophysical, geographical and socio-economic variability and differences among Member States are taken into full consideration in the context of a new

policy framework. For example, the proportion of GHG emissions attributable to the agricultural sector in Ireland is significantly higher than the EU average. This is due, in part to the dominance of livestock production in Ireland with beef and milk accounting for 67% of agricultural output. The use of absolute emissions for agriculture is inconsistent with scientific research by the UN FAO and the EU's Joint Research Centre, which both recognise that Ireland has one of the most carbon efficient livestock grass based production systems for beef and dairy. The high proportion of absolute emissions is also reflective of an anomaly, whereby there is less heavy industry in the Irish economy as a whole.

4. What are the most promising and cost-effective greenhouse gas reduction measures related to agriculture, forestry and other land use? Are there any technologies that would deserve special attention in research and technology development?

The European Council conclusions of 23-24 October 2014 rightly acknowledged the lower mitigation potential of the agriculture and land use sector. This is a key point, which ICOS believes must be incorporated into the design of future policy. This is not to be misinterpreted as a free pass for the agricultural sector. Better farm management practices, sustained over a period of time, aimed at reducing methane (CH₄) and nitrous oxide (N₂O) will contribute towards GHG mitigation. Examples include more efficient manure management, improved breeding, such as the Beef Data and Genomics Programme under Ireland's RDP 2014-2020 and better grassland management. Individual country specific sustainability programmes, such as the Origin Green initiative in Ireland can also contribute in terms of reducing the emissions intensity of food production and providing a platform to measure and sustain progress towards this overall objective.

5. What are the main obstacles and barriers to the implementation of emission reduction measures in agriculture, forestry and other land use?

First and foremost, it is vital to recognise that GHG emissions from European agriculture have declined overall between the period 1990 and 2014. Relative to 2005, GHG emissions from Irish agriculture are projected to decrease by 5% by 2020. This is despite expected increases in productivity over the same period. The implementation of substantial carbon efficiency measures are implicit in the achievement of this reduction. Progressing the development of the bioenergy sector will help to further reduce GHG emissions from agriculture and other land use. This will require financial incentivisation to encourage the development of sustainable biomass supply chains. An additional 300,000ha of land area has been converted to forestry in Ireland since 1990. The Irish Government have established targets to increase total forest cover from 11% to 18% by 2046, which will make a substantial contribution to GHG mitigation in the medium term.

6. On the basis of experience with the present set of rules on accounting, targets and flexibility, how could the present rules be improved, and which aspects could be maintained and which should be rejected in future?

The accounting rules for LULUCF were not developed sufficiently to be included under the current EU policy framework. That said, LULUCF credits are included under the Kyoto protocol. The methodology for measuring and reporting LULUCF emissions have progressed since 2008. The accounting criteria is set out in Decision No 529/2013/EU, which goes beyond international requirements by also measuring cropland and grazing land management. ICOS believes that LULUCF credits should be retrospectively included in the current Effort Sharing Decision (ESD) so as to ensure consistency between EU and

international benchmarks. Moreover, LULUCF credits including the contribution of grassland should be a key component of the new framework. ICOS notes that the targets set under the ESD for the 2013 to 2020 period were based on the respective wealth of Member States in 2008 and in the context of the economic crisis are not a true reflection of the prosperity of several EU economies including Ireland.

7. How could an element of flexibility in terms of using credits from LULUCF activities in the 2030 climate policy framework be introduced in a way that fully ensures the environmental integrity of the system?

It is important to reiterate that LULUCF activities were excluded from the current policy framework due to the underdeveloped nature of the accounting methodology at the time. The appropriate methodology has been subsequently put in place. Consequently, from the point of view of environmental integrity, LULUCF credits should be used to offset GHG emissions from the entire land use sector in line with the Kyoto Protocol. In addition, the carbon sequestration potential of the entirety of our natural land resources needs to be measured and accounted. This must include the contribution of agricultural grassland, hedges, forestry and peatland. Furthermore, the bioenergy sector makes 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 renewable biomass sector should be accounted under the land use sector.

8. What could be the main advantages and disadvantages of the three policy options outlined above, and which option(s) should be further developed or modified?

There are a number of pitfalls which the European Commission must avoid at all costs in the context of developing a new set of policy recommendations. It is critical that the future policy framework does not inadvertently increase global GHG emissions through carbon leakage. The continuation of the status quo as per option one, fails to address this concern. Crude policy options designed to reduce agricultural GHG emissions may constrain food production in the most carbon efficient food systems such as Ireland. Carbon leakage may result from the displacement of food production to less efficient food systems as it is inevitable that global food demand will increase due to a rising population. The inclusion of carbon intensity or carbon per unit of product as a means to measure GHG emissions from agriculture will avoid the issue of carbon leakage and encourage the adoption of technically feasible and cost effective mitigation measures.

9. Which is your preferred option? Why?

- Option 1 — LULUCF pillar
- Option 2 — land use sector pillar
- Option 3 — effort sharing
- A combination of options
- No preference

Please, provide an explanation for your choice in Question 9

It is the view of ICOS that the new framework needs to establish a holistic approach based on a combination of options, including: 1. The need to encourage the sustainable intensification of food production, so as to support economic development in rural areas across the EU. 2. Integrate the principle of carbon intensity or carbon per unit of product into future policy. 3. It is vital to address the enormous challenge of food security in the

context of a rapidly expanding global population. 4. Stabilise GHG emissions from agriculture through the adoption of technically feasible and cost effective mitigation measures. 5. Promote the carbon sequestration potential of the land use sector by supporting a range of measures including afforestation, forestry biomass and other bioenergy opportunities. 6. Implement appropriate accounting mechanisms consistent with international standards, which permits Member States to offset their agricultural emissions with soil and forest carbon stocks.