

Climate & Air Roadmap Consultation
Department of Agriculture, Food and the Marine
Climate Change & Bioenergy Policy Division
Grattan Business Centre
Dublin road
Portlaoise
Co. Laois

Sent by Post & Email

10th January 2020

Re: Climate and Air Roadmap Consultation

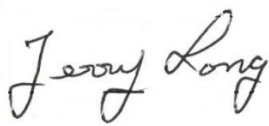
To whom it may concern,

The Irish Co-operative Organisation Society (ICOS) is pleased to respond to the public consultation on a draft national climate and air roadmap for the agriculture sector to 2030 and beyond.

ICOS is the umbrella body for over 130 co-operatives in Ireland – including the Irish dairy processing & milk purchasing co-operatives, livestock marts and other rural based enterprises – 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.

We look forward to engaging constructively and positively with the Department of Agriculture, Food and the Marine on these important issues.

Yours sincerely,



Jerry Long
President

'Ag-Climatise' A Draft National Climate and Air Roadmap for the Agriculture Sector to 2030 and Beyond

Submission by the Irish Co-operative Organisation Society (ICOS)

- 1. Are there other actions that could be considered for inclusion to further enhance progress and credibility of agricultural actions? Is there more that farmers and the food industry itself can do?**
- 2. Have you any feedback on how uptake of these actions can be encouraged and facilitated?**

- ICOS welcomes the publication of the Draft 'Ag Climatise' Roadmap, which aims to progress the agriculture measures identified in the All of Government Climate Action Plan published in June 2019 and to respond to the ammonia reduction targets assigned to Ireland.
- The All of Government Climate Action Plan has established a 10-15% greenhouse gas reduction target for the agriculture sector and Ireland must reduce its ammonia emissions by 1% by 2020 and 5% by 2030. Achieving these targets will be very demanding for the sector due to the limited mitigation potential from farm-based emissions.
- ICOS is broadly supportive of the list of measures and targets outlined in Actions 1 to 4. These proposals are largely based on the Teagasc Marginal Abatement Cost Curve and seem reasonable. The two most practical and cost-effective measures include switching from CAN to protected urea and from splash-plate to low emission slurry spreading.
- The range of measures illustrate that there is no silver bullet for agricultural emissions and demonstrate the need for added investment in extension and advisory services.
- The proposed changes will result in significant change at farm and food industry level, but are achievable, if the appropriate resources and structures are put in place to oversee the implementation of the Roadmap.
- The delivery of the 'Ag Climatise' Roadmap will be challenging but it will also present opportunities, which must be communicated to farmers and reinforced through the provision of appropriate levels of support e.g. grant aid or advisory supports.
- The agri-food sector has a proven track record in mobilising and responding to national strategies, highlighted by the strategic and co-ordinated approach of Food Harvest 2020 and Food Wise 2025.
- However, the availability of resources that will underpin the Roadmap (e.g. grant aid and advisory supports) have not been identified. The potential reduction in the CAP budget and the delay in the implementation of the CAP post 2020 is a concern.
- ICOS would like to make the following observations on Actions 1-4:

- The Roadmap sets out ambitious targets for 2022, 2025 and in the longer term related to low emission slurry spreading (LESS). DAFM has established separate requirements for farmers availing of the Nitrates derogation including mandatory use of LESS by 2021. It is important that grant aid remains available to all farmers including those in derogation once the requirement becomes mandatory to ensure these targets are fully met.
 - A move to LESS may necessitate additional slurry storage capacity on farms, which should be supported through TAMS.
 - The Roadmap will establish a so-called blueprint for zero/near zero nitrogen use and carbon neutral production. This approach is worth exploring so long as the productive capacity of Irish agriculture is not affected.
 - The achievement of the targets related to protected urea is critical, as to whether agriculture can realise its targets under the All of Government Climate Action Plan. Protected urea grows the same amount of grass as CAN, while being cost effective. However, there is an urgent requirement for greater clarity and the need to avoid mixed messaging related to 1.) the potential residue risk in milk (although the available literature indicates that this is a very low risk, additionally DAFM funded research will provide initial results in late 2020), 2.) chemical handling and 3.) shelf-life concerns.
 - The Roadmap identifies specific targets for dairy breeding, bearing in mind the need to take calf welfare considerations into account. Sexed Semen is a mitigation measure identified in the Teagasc MACC. The use of sexed semen will also increase the value of the beef output from the dairy herd. The lack of a sexed semen laboratory is a barrier to the usage of sexed semen, as bull selection and availability is limited without a lab. As such, the establishment of a permanent lab should be a defined target in the 'Ag Climatise' Roadmap.
 - The level of milk recording increased in 2019, assisted by positive incentives offered by the co-op sector including Dairygold Co-op and Kerry Agribusiness. However, the level of milk recording remains below 50% of dairy herds. The new Veterinary Medicines Regulation will require the use of selective dry cow therapy from January 2022, in view of AMR concerns. The 'Ag Climatise' target for milk recording should be reconsidered in light of this requirement. Furthermore, ICOS calls on DAFM to include milk recording as a supported measure under the new eco-schemes in the CAP post 2020.
- In relation to the second part of Question 1, Actions 1-4 does not include recommendations or targets related to slurry amendments or adding fatty acids to dairy diets. Both measures are identified as mitigation options under the Teagasc MACC.
 - The co-operative movement is supportive of the All of Government Climate Action Plan. It is willing to work with all stakeholders in a collaborative approach to progress the various actions and to demonstrate leadership in the area of climate action. This was evident in 2018, when ICOS published a detailed report called "Positive steps towards a low carbon future for the Irish dairy sector. The ICOS report includes many of the measures and recommendations outlined in the Teagasc MACC and 'Ag Climatise' Roadmap.

3. Are there other actions that could be considered to maximise the contribution of sustainable land management? Is there more that farmers and the food industry itself can do?

4. Have you any feedback on how uptake of these actions can be encouraged and facilitated?

- Hedgerows are widely recognised as an important carbon sink, as well as providing co-benefits related to biodiversity habitats. The Climate Change Advisory Council estimates that hedgerows in Ireland cover 276,460 ha, extend for 689,000 km and with other semi-natural habitat, cover up to 13% of farmland area.
- Improved management of existing hedgerows and incentives to encourage additional hedgerows should be looked at in the context of low afforestation numbers. Furthermore, the development of inventory accounting for hedgerows is required urgently to measure and to secure the carbon sequestration benefit provided by hedgerows.
- Additionally, it is also important to note that farmers applying for the derogation to the Nitrates Derogation will have to complete a biodiversity measure as part of the recent review.
- ICOS would also support measures that will encourage and incentivise farmers under the BPS to maintain a habitat management plan on their farm incorporating hedgerow networks, transitional grassland areas and greenways, whereas currently such land is deemed ineligible.
- The Roadmap includes a target of 450,000ha with optimised soil pH. There is room for improvement and a national lime promotion campaign should be prioritised under the 'Ag Climatise' Roadmap to increase application rates, improve soil pH and maximise grass utilisation.
- Forestry is a key element in the All of Government Climate Action Plan. However, there are ongoing problems associated with forestry, represented by the steep decline in annual afforestation rates. The 'Ag Climatise' Roadmap needs to urgently address this situation.
- Forestry is an effective measure to help tackle climate change, as well as creating jobs in rural Ireland and export income. However, if the appropriate steps are not taken, these targets cannot be considered realistic and we will fall short of what is required.
- There needs to be immediate engagement by the DAFM with all stakeholders to find solutions to the barriers preventing the wider uptake of forestry. There are ongoing issues related to felling licences, forest roads, planning permissions, the replanting obligation and environmental concerns.
- Other forms of forestry should be examined including agroforestry and small-scale native woodland plantations. However, any scheme targeted at livestock farmers should avoid the reclassification of farmland to encourage uptake.

- In this context, ICOS would support the development of an appropriately designed measure for livestock farmers using native broadleaf trees to increase forestry cover, provide shelter belts, offset emissions and increase biodiversity.
- The Roadmap includes a target to reduce the management intensity of 40,000 ha of peat based agricultural soils. A considered approach is required as these soils in many cases are farmed productively supporting farm families and livelihoods. An approach can only be acceptable if the measure is voluntary and supported with an appropriate incentive through the CAP that compensates farmers for reduced productivity.

5. Are these actions sufficient, or are there others you would suggest? Is there more that farmers and the food industry itself can do?

6. Have you any feedback on how uptake of these actions can be encouraged and facilitated? DAFM would also like to hear your views on the barriers and challenges to deployment of energy efficiency and renewable technology and also the types of supports and incentives that could increase deployment and wide spread adoption.

- The proposal for community engagement and microgeneration are to be welcomed. ICOS believes there is a real opportunity for the co-operative movement to be involved, as the co-op structure is a good fit for a number of the different green energy options as farmers understand and trust the co-operative model.
- The Report by the Joint Oireachtas Committee on Climate Action recommends the establishment of AD/Biogas Co-ops. It recommends that the installation of anaerobic digesters could be facilitated by low interest loans or grants overseen by DAFM. This recommendation requires specific focus under the 'Ag Climatise' Roadmap.
- ICOS supports the provision of a biomethane support scheme from Government with €40 million required in its initial phase. This will support 400 new jobs and abate 500,000 tonnes of CO₂.
- It is essential that the development of AD/Biogas Co-ops complements rather than competes with mainstream food production. The provision of a grass-based feedstock can come from increased production and efficiency rather than existing production levels, whilst providing an additional income stream for livestock farmers.
- The SSRH scheme for renewable heat from biogas is a step in the right direction. However, if a sustainable Biogas industry is to take root in Ireland, like in other EU countries such as Germany, similar levels of financial support will be necessary.
- Due to the significant economic costs involved in establishing an AD plant, a holistic approach is needed related to capital investment, SSRH tariff and planning issues. The use of standardised plant design parameters and consistent planning policy would be essential.

- We have had in the past the failure of willow and miscanthus schemes. There is a serious need to rebuild trust with farmers, with the improved SSRH biomass tariff a welcome development. The involvement of the co-operative model in the biomass production and supply chain will help to rebuild confidence in the sector.
- District heating systems (derived from renewable sources) are a realistic option through a co-operative model and should be supported.
- Existing dairy co-ops and marts have a significant footprint across Rural Ireland. These businesses have an existing infrastructure and supplier base that could readily support the development of bioenergy. The mart co-op structure could be used to complement their existing business interests through operating trading centres for biomass. However, capital investment and support will be required.
- Solar panels are a very effective system to engage with small and larger operators countrywide. It is important that community ownership through a co-operative approach is centrally involved in the RESS process. In addition, farm level electricity generation urgently requires a feed-in-tariff. In this regard, the co-op sector is active in this arena with Glanbia Ireland launching a solar PV scheme in 2019, partnering with SSE Airtricity and Activ8 Solar Energies. The provision of TAMS grant aid to support on farm solar is a welcome development.
- ICOS supports the continuation of the dairy farm grant provided by the SEAI for investing in energy efficient vacuum and milk pump technology.

7. Are there other actions which the State could consider, particularly in partnering with Industry?

- ICOS welcomes the proposal to develop a sustainability charter. This will be an important step in communicating the actions and commitment of the sector to a low carbon future to society and consumers of Ireland's agri-food products.
- Origin Green has helped the Irish agri-food sector to develop as a partner of choice globally for sustainably produced dairy and beef products. We are committed to strengthening the quality assurance schemes to ensure our position in the marketplace is maintained and increased.
- ICOS is actively participating in the CAP Consultative Committee and welcomes the commitment to discuss with all stakeholders through this process the design and shape of the new CAP Strategic Plan including climate action and other environmental measures.
- Capital Investment including low interest loans (Strategic Banking Corporation of Ireland, the European Investment Bank) will be needed to support farmers and industry to deliver the scale of change required.

8. Are these actions sufficient, or are there others you think that Industry should pursue?

- 9. Given that the State and policies such as the CAP can't finance or deliver all of the actions required, which actions or measures could Industry fund?**
- 10. Do you have views on how the market could better incentivise and/or reward primary producers for adopting and implementing the necessary actions?**

- ICOS welcomes the setting up of a network of demonstration 'sign post' farms that will highlight to farmers the 'win-win' opportunities that exist from embracing greater efficiency measures and new approaches that will also reduce farm level greenhouse gas and ammonia emissions. The dairy co-op sector with Teagasc have several joint programmes providing an existing organisation structure to roll out the 'sign post' farm initiative in an efficient manner.
- The Agricultural Sustainability and Support Programme (ASSAP) is another positive example of an industry led approach, working collaboratively and in partnership with Government through Teagasc and the local authorities to deliver improvements in water quality across 190 Priority Areas of Action.
- Farmers and their co-operatives can help deliver environmental goals through the following actions:
 - Existing joint programmes between dairy co-ops and Teagasc.
 - Existing advisory and support programmes such as the ASSAP programme.
 - Provision of incentives and supports such as the Dairygold Milk Supplier Sustainability Bonus and support for soil testing provided by several co-ops.
 - Provision of low-cost loans to support sustainability actions through MilkFlex.
 - The development of innovative programmes such as the Glanbia Ireland Solar PV scheme.
 - Providing a joined-up approach. For example, Irish dairy co-ops are multi-purpose businesses with interests beyond milk processing, including agri trading, feed milling etc
 - Farmers trust and have confidence in their co-ops. This is important in terms of delivering fundamental change.
 - The establishment of new and existing co-ops have significant potential to support the successful development of a sustainable bioenergy/renewable sector.
 - Direct communications and messaging to their shareholders through organised events, newsletters, text messages etc
- ICOS welcomes in particular action 17, as a key approach to delivering emission reductions from agriculture. Key is greater N-use efficiency through the use of protected urea, low emission slurry spreading, use of clover, optimising soil pH and timing of slurry spreading. Adhering to these measures will require a new focus on improving N-use efficiency supported by an inclusive advisory strategy involving Teagasc, private advisors and the co-op network.
- The approach to methane will be supported through improvements in dairy and beef breeding programmes. The development of new technologies including feed additives will be pursued but must be proven to work on pasture based grazing systems and

accounted for within the national inventories. As this work is underdevelopment, ICOS questions the inclusion of the goal to stabilise methane emissions by 2020.

- In relation to action 23, the development of horticulture, protein crop production, together with organic farming, agro-forestry and alternative economic opportunities should be examined as a means of lower carbon and more extensive land use. However, there must be a financial return from these activities.
- ICOS welcomes the focus on animal health strategies to support climate ambitions. This approach will also have important co-benefits for animal welfare and responding to the challenge of antimicrobial resistance.
- ICOS strongly recommends a reference to supporting the co-operative model under action 25 as a means to support supply chain developments especially related to renewable energy and bioeconomy opportunities.

11. What are your views on these six guiding principles in preparing for the future? Are they sufficiently comprehensive or are there others you would add?

12. Innovation is now widely recognised as a key driver of long-term growth and sustainable development and addressing of challenges such as Climate Change. What type of approaches and processes could assist the Irish agri-food innovation system to address economic and societal challenges and facilitate increased networking, collaboration and investment?

- ICOS fully supports the six guiding principles as set out in the 'Ag Climatise' Roadmap and commits to working with all stakeholders to implement the measures on the ground in a timely manner. The early adoption of these measures will be important as actions adopted in 2021 will contribute 10 times more than measures introduced in 2030.
- The proposals look good on paper but all stakeholders need to participate in a coordinated process where real change can be made. This requires a lead agency that will deliver results, monitor progress, supported by financial resources. The Government will need to have a central role if the result they require is to be achieved. A weakness is that the 'Ag Climatise' Roadmap does not assign responsibility for the achievement of the various actions nor does it specify the level of resources needed to implement the Roadmap. The allocation of responsibilities and resources will provide greater credibility from the point of view of farmers, industry and the wider public.
- There is a need for all actors including Government Departments (DAFM, DCCAE), State Agencies (Teagasc, Bord Bia, Enterprise Ireland, the Sustainable Energy Authority of Ireland), EU agencies such as the European Investment Bank, industry representatives, farm bodies and wider society to support the implementation of the Roadmap by working in a collaborative and coordinated manner.
- The agri-food sector has shown in the past the ability to deliver results, playing a critical role in the economic recovery of the Irish economy in the aftermath of the financial

crash and recession. The sector has the capacity to deliver again in relation to climate action. The co-op movement and farmers can deliver once the Roadmap is in place, providing a clear direction for all stakeholders to follow with a realistic plan for the way ahead.

- Innovation and change will be part of the wider response to climate change. Funding is required to support new research into new technologies that will reduce greenhouse gas and ammonia emissions. The MACC curve is an important resource for the agri-food sector, which will require updating based on the latest science and research findings.

ENDS

10th January 2020