



IFA submission to the Strategic Environmental Assessment  
Scoping Report Agri Food Strategy to 2030

September 2020

## 1. Introduction

As Ireland's largest farming organisation representing 72,000 farmers and farm families, we welcome the opportunity to participate in this consultation process.

Irish agriculture has the potential to further grow and develop in the years ahead, in line with the Food Wise 2025 growth plan for the sector. Building on its important role for the Irish economy, representing 7.7% of total employment, with exports in 2018 valued at €13.7 billion.

Irish agriculture rightly has a global reputation for high environmental standards. It is important that the Strategic Environmental Assessment (SEA) fully recognises the positive actions taken by farmers and builds on these to further improve the sustainability of the sector.

## 2. Positive actions taken by farmers

Irish farmers are fully engaged with sustainable agricultural practices and committed to climate action. The actions undertaken by farmers clearly demonstrate their willingness to improve sustainability and to actively contribute to climate change mitigation, when focussed supports are introduced. Some of the actions being undertaken by farmers to meet the environmental challenges of reducing greenhouse gas (GHG) and ammonia emissions, increased carbon capture, improved water quality, protecting and improving biodiversity include:

- All farmers in receipt of a basic payment maintain their land in Good Agricultural and Environmental Condition (GAEC) across a range of areas.
- As highlighted in the SEA Scoping Report, 50,000 farmers participate in the Green Low Carbon Agri Environment (GLAS) Scheme. The GLAS scheme makes a positive difference for the climate, water quality and biodiversity in the following ways:
  - Almost 13,000km of watercourses will be fenced off from livestock.
  - Almost 46,000ha of traditional hay meadow will be planted.
  - Almost 240,000ha of carbon sequestering low-input permanent pastures will be created.
  - 360km of arable grass margins, as well as 62km of riparian margins will be created.
- Over 212,000 carbon assessments have been completed on farms using the Teagasc/Bord Bia carbon navigator as part of Bord Bia's Origin Green Programme.

Farmers have also moved beyond the regulatory environmental obligations, participating in voluntary programmes such as Smart Farming, the Agricultural Sustainability Support and Advisory Programme (ASSAP) and European Innovation Partnerships, such as the BRIDE Project. Such proactive engagements by farmers to improve their farms sustainability have resulted in:

- Almost doubling of phosphorous use efficiency over the past two decades.
- Ireland has the 23<sup>rd</sup> lowest nitrogen surplus of the EU with the 6<sup>th</sup> highest water quality.
- Ireland's dairy farmers having the lowest greenhouse gas GHG emissions per kilo of output in the EU.
- Ireland's beef and dairy farmers are in the top five for lowest GHG emissions per kilo of output.
- Farmer demand for ammonia reducing equipment (Low Emission Slurry Spreading) currently exceeds supply.
- Farmers have fully taken up all air quality and climate action policy measures.

Any environmental assessment that evaluates environmental consequences must be logical and identify actions that can build on Irish agricultures green credentials whilst maximising the economic growth of the agri-food sector in an environmentally sustainable way. Irish farming has and will continue to play its part when it comes to addressing environmental challenges.

### 3. Improving Farm Sustainability

Farmers can improve the environmental sustainability of their farms if properly supported.

#### 3.1. Introduction of Sustainable Development Programme

Funding is required to introduce a Sustainable Development Programme (SDP) to co-ordinate the delivery of price supports for farm-scale and community-based renewables and to ensure the maximum delivery of the Teagasc MACC climate roadmap. This roadmap sets out key measures to displace on farm fossil fuel use, to recognise carbon sequestered by the sector and to support greater farm level efficiency.

#### 3.2. Improved Low Emissions Slurry Spreading Scheme

The existing Low Emissions Slurry Spreading (LESS) scheme, which while currently well backed by farmers, requires additional support to escalate action to address air quality (ammonia) challenges.

IFA proposes that:

- That the overall grant aid available for individual farmers is increased to 60%.
- That the separate limit to general TAMS is increased.
- That it remains a strong measure in future environmental schemes.
- That investment in LESS equipment is VAT exempt.

#### 3.3. Support increased use of protected urea, lime, slurry additives and soil aeration technologies

- The use of coated or *protected* urea is recommended by Teagasc, to help address climate and ammonia challenges. They report that using protected urea can reduce ammonia losses into the atmosphere by 80% compared to standard urea. *Protected* urea is more expensive and is less readily available to purchase. To encourage uptake, an incentive scheme should be introduced to close the differential gap and includes an additional top up incentivise uptake of protected urea.
- Lime is an important element to neutralise the acidity in Irish soils and restore them to optimum soil pH, which supports crop growth and overall soil quality, whilst reducing risk of run-off and nutrient losses. Two thirds of soils are at sub-optimum pH levels. As per the Programme for Government Commitment, there is an urgent need for the Department to introduce a liming scheme to support use on Irish farms, as suggested by Teagasc<sup>1</sup>.
- Slurry additives applied in winter slurry storage are recognised by Teagasc<sup>2</sup> as helping to reduce emissions. Such slurry additives are costly and some farmers have questioned the efficacy of the claims made by the slurry additive suppliers. A support should be put in place to encourage slurry additives uptake, and Teagasc or the Department should publish an annual list of slurry additive products that they have tested and that deliver the outcomes claimed.
- Soil structure is critical in determining the provision of nutrients, water and air in soil as this is dictated by soil structure. Soil aeration can speed up the recovery process by improving drainage, air diffusion and root exploration, which in turn promotes growth. The introduction of supports for soil aeration equipment will benefit soil structure and production.

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<sup>1</sup> Farming Independent (2018) *Teagasc baffled by ongoing decline in lime application*. Accessed online: <https://www.independent.ie/business/farming/beef/teagasc-baffled-by-ongoing-decline-in-lime-application-37446111.html>

<sup>2</sup> Irish Examiner (2018), *Positive result for slurry additives*. Accessed online: <https://www.pressreader.com/ireland/irish-examiner-farming/20181101/281732680487113>

### 3.4. Expansion of current sustainability schemes

- In 2019, the average cost savings identified on participating farms that took part in the Smart Farming Programme was €6,300 with associated GHG reductions of 10%. As recommended in the Joint Oireachtas Climate Action Committee Report *Climate Change: A Cross-Party Consensus for Action March 2019*, the programme should be developed and expanded<sup>3</sup>.
- The Beef Data and Genomics Programme (BDGP) has been effective in improving the efficiency of the national suckler cow herd. This scheme must be simplified and built upon with an increase in the allocation for the scheme. The Irish Cattle Breeding Federation (ICBF) estimate that by 2030, the genetic gain achieved through the programme will reduce GHG emissions by 14% per kg of beef produced<sup>4</sup>.
- The GLAS scheme is oversubscribed, which demonstrates the willingness and interest of farmers to participate in agri-environment schemes. Farmers are enthusiastic about seeking ways to improve the sustainability of their farms and they must be supported with a payment for delivering the public service beyond income forgone and cost incurred.

### 3.5. Support for anaerobic digestion and on-farm renewables

Micro-energy, anaerobic digestion, farm-scale and community renewable energy projects have all been recognised for a long time as important tools to displace fossil fuel use in rural areas, reduce environmental risks (water, air, climate) and generate alternative income streams. In 2019, their important role was highlighted in the Oireachtas Committee on Climate Action Cross-Party Consensus for Action report<sup>3</sup>.

If the potential of on-farm renewables is to be realised the following measures are required:

- The Department of Housing, Planning and Local Government should review existing planning obligations, for all on-farm renewable projects, to bring planning requirements in line with other EU Member States.
- Tiered supports are required for the development of anaerobic digesters, ranging from farm scale (up to 0.5MW), to community/small co-op scale (0.5MW – 2MW) and large co-op (5MW).
- The provision of a Capital Grant in the order of 50%-60% which is ring fenced from existing farm supports
- Development of a Feed-in Tariff paid on the metered output
- Planning exemptions for farmers for small scale developments. One-stop advice clinics should be provided to assist project developers to submit successful applications.

### 3.6. Carbon sinks from forests, permanent pastures and hedgerows must be fully counted

The positive climate impact achieved through carbon sinks, such as forests, hedges and permanent pastures, are currently not fully counted. This has led to an unbalanced picture of agriculture's climate impact. For example, afforestation since 1990 will remove an estimated net 4.5m tonnes of CO<sub>2</sub> from the atmosphere per annum, over the period 2021 – 2030. Yet the climate value of this will not be fully recognised, but any changes in methane and cattle numbers will be fully counted.

The Department of Agriculture, Food and Marine must further incentivise carbon sinks on farms and these sinks, associated with forestry, hedgerows and permanent pasture, must be counted when measuring agriculture's climate contribution.

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<sup>3</sup> Houses of the Oireachtas (March 2019) *Report of the Joint Committee on Climate Action Climate Change: A Cross-Party Consensus for Action*.

<sup>4</sup> Irish Cattle Breeding Federation (ICBF), *Reducing the Carbon Footprint on Irish Dairy Farms*, Accessed online: <https://www.icbf.com/wp/?p=14310>, 4<sup>th</sup> December 2019

In addition to identifying positive actions that can be built on to improve sustainability at farm level, it is important that the SEA considers the environmental consequences of proposed plans or programmes within a wider context considering “transboundary impacts” beyond the island.

Within Ireland, the Environmental Protection Agency (EPA) are tasked with reporting and monitoring Ireland’s environmental performance, which is submitted to the European Union (EU) and the United Nations (UN) on an annual basis for review. When documenting trends such as GHG the accounting methodology must be in line with the Intergovernmental Panel on Climate Change (IPCC) guidelines for National GHG inventories. As part of this methodology, methane and other GHGs are currently accounted for using the GWP (Global Warming Potential) methodology.

However, it is questionable as to how appropriate this methodology is in accurately depicting the GHG’s warming effect on the planet. Under current policies, long and short lived GHG are treated as being interchangeable, when in-fact the warming effect on the planet between long and short lived GHG is very different.

Taking methane as an example, it has a strong warming potential early in its life cycle but then diminishes rapidly within approximately 10 – 12 years. In comparison to carbon dioxide, the warming affect is much lower but extends over a longer timeframe of approximately 1,000 years and accumulates in the atmosphere long after it was emitted from the source.

As climate research continues to evolve, policies must also evolve to more effectively align GHGs and their effects on the warming of the planet. Research from the University of Oxford<sup>5</sup> proposes a more accurate method of evaluating the climate impact of short lived GHGs, such as methane known as GWP\*. In evaluating this evidence base, the GWP\* calculation should be adopted at national, EU and UN levels.

Aside from the counting methodology used to report on GHGs, it is questionable if targets used are framed within the correct units for the benefit of the overall global environment. Under the effort sharing legislation, GHG reduction targets were set, focusing solely on reducing absolute or total emissions from sectors such as; transport, agriculture, infrastructure and waste. While the focus on overall emissions is important, this does not account or consider the efficiency of production from the use of resources. For example, the carbon footprint of a kilo of beef or milk produced.

Reducing overall emissions is critical, although GHGs do not respect national and EU boundaries as recognised in the SEA to some degree through “transboundary” movements. Policies must ensure that in the movement to reduce overall emissions, aligned with targets, that this is not having a contrary consequence on emissions globally.

Examining this in the context of agriculture and food production, the demand for food is rising with the world population predicted to grow to 9.7 billion by 2050. Therefore, in a shift to lower overall emissions, it would be counterproductive to limit carbon efficient food production in a country such as Ireland, as market demands would be replaced from countries that have a higher carbon footprint. This is commonly known as carbon leakage. Teagasc estimate that a 50%

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<sup>5</sup> Allen, M.R., Shine, K.P., Fuglestedt, J.S., Millar, R.J., Cain, M., Frame, D.J. and Macey, A. H. (2018), *A solution to the misrepresentation of CO<sub>2</sub> equivalent emissions of short-lived climate pollutants under ambitious mitigation*. *Climate and Atmospheric Science*, 1(1), p.16.

reduction in Irish beef being displaced by South America would lead to a further net 3.6 million tonnes of GHG emissions<sup>6</sup>.

It is of paramount importance that policies do not hinder sustainable food producing countries in the aspirations to meet “absolute” or “total” reduction targets that disguise efficient use of resources. The emphasis should be on carbon efficiency, environmental and economic sustainability.

#### 4. Conclusion

The agri-food sector plays a vital role in the Irish economy and within rural Ireland. From the earlier sections of this submission, the proactive engagement and willingness to adopt sustainable practices by farmers is affirmative. Equally of importance, is that this willingness at farm level is supported by addressing the three pillars of sustainability in equity. The financial and social aspect of sustainability is often secondary to the environmental aspect.

The capabilities and potential of one pillar is limited by the resources of another, put simply, farmers cannot be green while their finances are in the red. Consumer’s willingness to pay for environmental services in food produced to the highest standards, must match any ambitions put forward. There is a need for public money for public goods, and it is of fundamental importance that a pre-emptive approach is taken in addressing concerns raised in the draft and final SEA through the many actions and measures identified in this submission.

IFA would welcome the opportunity to meet and discuss this submission to positively progress the development of the Agri-Food Strategy to 2030 in a sustainable manner. Please contact Geraldine O’Sullivan, Senior Policy Executive Environment & Forestry on E: \_\_\_\_\_ T: \_\_\_\_\_  
to organise meeting.

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<sup>6</sup> Teagasc (2011), *Irish Agriculture, Green House Gas Emissions and Climate Change: opportunities, obstacles and proposed solutions*, Oakpark, Carlow.